



"Managing and conserving natural, cultural, and recreational resources"

September 19, 2005

Dr. Ruth Greenspan
Historic Preservation Specialist
Environmental & Enhancement Group
Arizona Department of Transportation
205 South 17th Avenue Room 213E
Phoenix, AZ 85007-3212

RE: Project No. NH-202-D(ADY)
TRACS No. 202L MA H5764 01E
South Mountain Transportation Corridor
Continuing Section 106 Consultation
SHPO-2003-1890 (25323)

Janet Napolitano
Governor

State Parks
Board Members

Chair
Elizabeth Stewart
Tempe

William C. Porter
Kingman

William Cordasco
Flagstaff

Janice Chilton
Payson

William C. Scalzo
Phoenix

John U. Hays
Yarnell

Mark Winkleman
State Land
Commissioner

Kenneth E. Travous
Executive Director

Arizona State Parks
1300 W. Washington
Phoenix, AZ 85007

Tel & TTY: 602.542.4174
www.azstateparks.com

800.285.3703 from
(520 & 928) area codes

General Fax:
602.542.4180

Director's Office Fax:
602.542.4188

Dear Dr. Greenspan:

Thank you for consulting with the State Historic Preservation Office (SHPO) pursuant to Section 106 of the National Historic Preservation Act regarding plans for the South Mountain Freeway connecting Interstate 10 in west Chandler to I-10 in west Phoenix, Maricopa County, Arizona, and submitting cultural resources reports and recommendations for review and comment. Dr. Bill Collins, Deputy SHPO/Historian, and I have reviewed the submitted materials and offer the following comments.

The submitted cultural resources reports [*An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* and *An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*] are adequate. Before responding to the eligibility recommendations, some clarification is needed:

- 1) Page two of the cover letter states that the Class 1 identified 27 previously recorded prehistoric and historic archaeological sites; the breakdown of the eligibility status of these sites (i.e., 5 eligible, 7 not eligible, 7 not evaluated and 8 unknown) in the report differs from the characterization in the cover letter (i.e., 5 eligible, 5 not eligible, 9 not evaluated, and 8 unknown).
- 2) The text of the cover letter neglects to mention that the eligible Barnes Dairy Barn and the ineligible Dad Farmstead are part of the eligible 6100 West Dobbins Road Streetscape (although this is part of the listing in Table B to the cover letter). Dr. Collins also commented that the reasoning behind the suggested D eligibility of the 6100 West Dobbins Road Streetscape is actually more appropriate to A eligibility, so he disagrees with the recommendation that it is "more" eligible for D than A (see page 7 of cover letter). He agrees that it is A eligible, and did not see D eligibility properly evaluated at all.

We appreciate your cooperation with this office in considering the potential impacts of development on cultural resources situated in Arizona. If you have any questions or comments, please contact me at (602) 542-7140 or electronically at djacobs@pr.state.az.us.

Sincerely,

David Jacobs
Compliance Specialist/Archaeologist
State Historic Preservation Office



Arizona Department of Transportation
Intermodal Transportation Division

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Janet Napolitano
 Governor

Victor M. Mendez
 Director

August 31, 2005

Sam Elters
 State Engineer

Brian Kenny
 Environmental Programs Manager
 Maricopa County Department of Transportation
 2901 West Durango Street
 Phoenix, Arizona 85009

RE: Project No: NH-202-D()
 TRACS No. 202L MA 054 H5764 01L
 South Mountain Transportation Corridor
 Section 106 Consultation
 Draft Cultural Resources "Programmatic Agreement"

Dear Mr. Kenny:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses nine variations of five alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 in west Phoenix (see attached map). As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

The Area of Potential Effect (APE) is comprised of five alternative (overlapping) freeway corridors (T01, T02, T03, T04, and T06) that extend from I-10 west of Phoenix to I-10 in west Chandler, south of the greater Phoenix metropolitan area. Alternative corridors are 1000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length. Land jurisdiction for the alternative alignments includes private land (5,160.7 acres) and lands administered by the Arizona State Land Department (101.4 acres), the Bureau of Land Management (35.1 acres), and the City of Phoenix Parks and Recreation (62.32 acres).

The cultural resources component of the EIS includes four technical studies:

- *A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona* (Burden 2002).
- *A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona* (Darling 2005).
- *An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck and Touchin 2005).

Kenny
 August 31, 2005
 Page 2 of 2

- *An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2005).

Twenty-two archaeological sites and 21 historic sites were identified in the proposed alternative alignments. In addition, the South Mountain Range is identified as place of traditional cultural importance to Native American tribes. Please let me know if you would like to review any of the above reports and they will be sent to you.

FHWA/ADOT is circulating the draft Programmatic Agreement (PA) that addresses cultural resources for the project for your review. Please review the enclosed draft PA. If you find the PA adequate and wish to participate in the final PA, please indicate your concurrence by signing below and return within 20 days. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail RGreenspan@azdot.gov.

Sincerely,

Serelle E. Laine, Coordinator
 Historic Preservation Team
 Environmental & Enhancement Group
 205 South 17th Avenue Rm. 213E Mail Drop 619E
 Phoenix, Arizona 85007-3213

Enclosures

Signature for Maricopa County
 Department of Transportation Concurrence

Date

9-20-05

cc: SThomas (FHWA), WVachon (FHWA)





Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-2264

September 27, 2005

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Section 106 Consultation
Draft Programmatic Agreement

Ms. Carol Legard
Historic Preservation Specialist
Advisory Council on Historic Preservation
12136 W. Baywood Avenue, Suite 330
Lakewood, Colorado 80228

Dear Ms. Legard:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses nine variations of five alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 in west Phoenix (see attached map). As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

FHWA originally consulted with your office regarding the draft Programmatic Agreement (PA) in August 2003. At that time, the Council declined to participate. Recently, FHWA has re-circulated a second draft Programmatic Agreement to all consulting parties. It was decided to do this because when it was originally circulated, few tribes opted to participate at that time. FHWA felt this re-circulation of the PA would allow the tribes another opportunity to participate in the PA. This second draft PA has been edited to address any comments from the first draft as well as to also address TCP properties more specifically.

The purpose of this letter is to notify the Advisory Council on Historic Preservation and to determine Council participation pursuant to 36 CFR § 800.6(1). Please review this information and if the Council plans to participate in consultation, inform us within 15 days of receipt of this



2

notice. If there is any additional information you require for this project or if you have any questions or comments, please contact Ruth Greenspan at (602) 712-6266 or via email at rgreenspan@azdot.gov. Thank you.

Sincerely,

STEPHEN D. THOMAS

Robert E. Hollis
Division Administrator

Enclosure (Map and draft Programmatic Agreement)

Signature for Advisory Council on
Historic Preservation Concurrence

Date

cc:
SThomas
RGreenspan (619E)
REllis (619E)
SDThomas :cdm



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-2264

September 29, 2005

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Section 106 Consultation
Traditional Cultural Places

Mr. Richard Narcia, Governor
Gila River Indian Community
P.O. Box 97
Sacaton, Arizona 85247

Dear Governor Narcia:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. As part of this effort, FHWA has previously invited you to review and comment on several cultural resource reports and on a draft Programmatic Agreement (PA), and has requested your participation in discussions regarding the potential effects of the proposed undertaking on areas of traditional cultural significance, including the South Mountain Range.

Although no written response to previous consultations has been received, on September 20, 2005, a meeting was held at the Gila River Indian Community (GRIC) to discuss Traditional Cultural Places (TCPs) and any other concerns your community has regarding historic properties of religious or cultural importance that have the potential to be affected by this project. In attendance at the meeting were Barnaby Lewis, Cultural Resource Specialist, GRIC; Andrew Darling, Assistant Coordinator, Cultural Resource Management Program, GRIC; Katherine Neustadt and Ruth Greenspan, Historic Preservation Team, (ADOT); and Mark Brodbeck, Coordinator, Cultural Resources Section, HDR, Inc.

The following items were discussed at the meeting:

1. The GRIC's Cultural Resource Specialist confirmed that all of South Mountain is viewed by the Akimel O'odham and Pee Posh as an important and sacred place, and that cutting across, or tunneling under, any part of it would be viewed as a desecration. In the opinions of Mr. Lewis and Dr. Darling the only way to mitigate impacts to South Mountain would be to avoid it completely.
2. It was acknowledged by all in attendance that the only ways to completely avoid South Mountain are:
a) the no-build alternative, and
b) constructing a segment of the freeway on the GRIC reservation.
It was the opinion of Mr. Lewis that a freeway on the northern edge of the reservation would create an "unnatural" barrier that would serve to hinder access to South Mountain for Community members. In addition, Community members have voiced general objections to having a freeway on the reservation.
3. There are other TCPs and highly sensitive historic properties, such as the Villa Buena site, within some of the proposed alignments and in the general project area that have potential to be adversely affected by the proposed freeway.



4. Mr. Lewis said he was not aware of any TCPs north of the Salt River within the study area, but added that other Native American tribes should be consulted to confirm that there are no TCP concerns in that area.
5. Mr. Lewis and Dr. Darling agreed that GRIC will provide FHWA and ADOT with a formal response to the consultation letter of July 7, 2005 regarding TCPs, and agreed that the response would include a map of the project area with areas that GRIC would like to see avoided in the event that an alternative other than the no-build alternative is selected. This response will be made by October 3, 2005.
6. Mr. Lewis and Dr. Darling confirmed that GRIC is interested in participating in continuing consultation on this project, and agreed that GRIC will review and provide comments on the draft Programmatic Agreement by October 3, 2005.

At this time, no decisions have been made regarding the various alternatives being studied for this project. If GRIC provides FHWA with a map and written information regarding locations and possible mitigation measures for those areas your community would like to see avoided by the proposed freeway, FHWA will be in a position to insure that GRIC's concerns are given full consideration in the decision-making process. Any information provided would be kept strictly confidential.

Additionally, if GRIC chooses to participate in future consultation as a Concurring Party to the Programmatic Agreement, any comments on the draft PA provided by October 3, 2005 will be considered in preparation of the final document. If GRIC opts to participate in cultural resource consultation at a later date, FHWA would make a good faith effort to address any concerns of the Community.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your tribe/community through continued Section 106 consultation. We also look forward to continuing consultation with your office. If you have any questions or concerns, please feel free to contact Ruth L. Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely,

STEPHEN D. THOMAS

Robert E. Hollis
Division Administrator

Enclosure

cc:

Barnaby Lewis, Cultural Resource Specialist, Cultural Resource Management Program, Gila River Indian Community, P.O. Box E, Sacaton, AZ 85247
J. Andrew Darling, Assistant Coordinator, Cultural Resource Management Program, Gila River Indian Community, P.O. Box 2140, 192 S. Skill Center Road, Room 200, Sacaton, AZ 85247
Sandra Shade, Director, Department of Transportation, Gila River Indian Community, P.O. Box 97, Sacaton, AZ 85247
SThomas
RGreenspan (619E)
REllis (619E)
SDThomas:cdm

Richard P. NARCIA
GOVERNOR



MARY V. THOMA
LIEUTENANT GOVERNOR

Gila River Indian Community

EXECUTIVE OFFICE OF THE GOVERNOR & LIEUTENANT GOVERNOR

September 30, 2005

Robert E. Hollis, Division Administrator
U. S. Department of Transportation
Federal Highway Administration
Arizona Division
400 East Van Buren Street, Suite 410
Phoenix, Arizona 85004

RE: South Mountain Transportation Corridor, Section 106 Consultation, Traditional Cultural Places; HA-AZ NH-202-D (ADY); TRACS No. 202L MA 054 H5764 01L

Dear Mr. Hollis,

This letter is in response to your letter dated July 7, 2005 regarding the "South Mountain Transportation Corridor, Section 106 Consultation, Traditional Cultural Places; HA-AZ NH-202-D (ADY); TRACS No. 202L MA 054 H5764 01L." The Environmental Impact Statement addresses nine variations of five alternative alignments for the proposed South Mountain Freeway. This project, which extends around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 in west Phoenix, would be located in close proximity to the Gila River Indian Community and would negatively impact cultural resources; especially traditional cultural properties.

The Gila River Indian Community has concerns regarding 21 archaeological sites identified in the report "A Class III Cultural Resources Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County (Darling 2005)" as well as concerns for the protection of the traditional cultural properties in the South Mountain Range.

The cultural significance of South Mountain figures prominently in oral traditions of the Four Southern Tribes (Gila River Indian Community; Salt River Pima-Maricopa Indian Community; Ak-Chin Indian Community and the Tohono O'odham Nation) as well as the Pee Posh, formally known as the Maricopa Tribe of the Gila River Indian Community and of the Salt River Pima-Maricopa Indian Community.

The Gila River Indian Community identifies the South Mountain as a Traditional Cultural Property. Traditional cultural properties are defined as historic sites that are important because of "their association with cultural practices or beliefs of a living community that (a) are rooted in the community's history, and (b) are important in maintaining the

Robert E. Hollis, Division Administrator
RE: South Mountain Transportation Corridor
September 30, 2005

2

continuing cultural identity of the community" (National Register Bulletin 38). Historic sites must exhibit four attributes: an age greater than 50 years; existence as a tangible property; integrity in relationship to the transmission and retention of cultural beliefs or the performance of ceremonial practices; and integrity of condition wherein their traditional cultural significance has not been reduced through alteration of location, setting, design or materials.

The Gila River Indian Community was established by an act of Congress in 1859 that comprises 372,000 acres that protected some of our ancestral lands and provided a land base for the Akimel O'odham and Pee Posh. However Muhadagi Doag (Greasy Mountain) was not included as part of the present day community. This mistake restricted and prevented access by community members to this sacred mountain. South Mountain stands prominently within the landscape and is central to our traditional and spiritual understanding of respect for the natural resources and vast ecosystem. We believe this unique relationship enabled our ancestors to live harmoniously within this desert environment from time immemorial and this relationship is essential to the continued survival of our culture. Our elders reaffirm valuable cultural information regarding our people's use of the mountain area through oral tradition, which continuously reiterates and renews our ties with the land through stories and songs of the people of this community.

Muhadagi Doag (South Mountain's traditional name from the story of creation) has been well documented by several researchers in published literature as a traditional cultural property of central importance to the Akimel O'odham of the Gila River Indian Community (Bahr 2001:13, 32.; Bostwick 2002:1; Densmore 1929:41; Lloyd 1911:77, 125; Saxton and Saxton 1973:328; Rea 1996:18; Russell 1908:216,224, 278; Spier 1933:351). The South Mountain has also been documented as traditional cultural property known as Avikwax'os, which is documented in published literature as well (Harrington 1908:33; Rea 1996; Spier 1933:252-253). Muhadagi Doag is one of the mountain homes of Se'ehe also known as I'itoi an ancient deity of the O'odham. Due to the sacred nature of the area, private traditional religious activities are still conducted in various forms by individual community members today.

Although some modern impacts have occurred since the establishment of the City of Phoenix, the South Mountain range continues to hold its religious and cultural significance. The proposed transportation corridor will be intrusive to the spiritual connections associated with the people of the Gila River Indian Community and it will forever alter the landscape and view-shed of South Mountain as they are experienced by the people of this Community. Trails and shrines located within the proposed corridor will be destroyed and contribute to diminishing our traditional way of life. Numerous petroglyphs have been recorded within and around South Mountain that demonstrate its traditional religious uses since the prehistoric days of our Hohokam ancestors.

The National Historic Preservation Act of 1966 as amended provides a compliance process for eligibility for the National Register of Historic Places and those impacts to these sites must be considered in order to provide an opportunity to protect traditional

Robert E. Hollis, Division Administrator
 RE: South Mountain Transportation Corridor
 September 30, 2005

3

cultural properties. The Gila River Indian Community identifies archaeological sites, Villa Buena (AZ T:12:9 ASM) and Pueblo del Alamo (AZ T:12:52 ASM), as traditional cultural properties. Although modern development has impacted the Villa Buena site, in particular, and limited archaeological investigations have been conducted, this site still holds its physical and cultural integrity and its religious and cultural significance has not diminished.

FHWA must take appropriate mitigation measures in adversely affecting the physical integrity of these traditional cultural properties which are sacred sites. In our view cutting out part of the mountain or tunneling for the proposed road project will adversely impact South Mountain. Your full consideration of our compelling cultural connection to South Mountain must be acknowledged.

The Gila River Indian Community (GRIC) appreciates the efforts of the Federal Highway Administration in addressing our concerns and anticipates meaningful consultations in accordance with the National Historic Preservation Act on this undertaking. Please call GRIC Cultural Resource Specialist, Barnaby V. Lewis at 1-520-562-3570 should you have any questions or require further information.

Sincerely,

Mary V. Thomas, for
 Richard P. Narcia, Governor 9-30-05
 Gila River Indian Community

cc: John C. Ravesloot GRIC-CRMP Coordinator
 Larry Stephenson, GRIC Land Use Planning & Zoning
 Sandra Shade, GRIC Department of Transportation
 Kae Neustadt, ADOT Historic Preservation Specialist
 Ruth Greenspan, ADOT Historic Preservation Specialist
 Mark Brodbeck, HDR Engineering, Inc.
 Four Southern Tribes of Arizona



Janet Napolitano
 Governor

Victor M. Mendez
 Director

Joni Ramos, President
 Salt River Pima-Maricopa Indian Community
 Route 1, Box 216, 10005 E. Osborn
 Scottsdale, Arizona 85256

RE: Project No: NH-202-D(ADY)
 TRACS No. 202L MA 054 H5764 01L
 South Mountain Transportation Corridor
 Continuing Section 106 Consultation
 Second Draft Programmatic Agreement follow-up

Dear President Ramos:

The Arizona Department of Transportation (ADOT) on behalf of the Federal Highway Administration (FHWA) is following up on our recent request for input on the draft Programmatic Agreement (PA) for the South Mountain Corridor freeway project (letter from Hollis, FHWA, July 7, 2005). ADOT/FHWA are in the process of finalizing the South Mountain Corridor PA to address project effects as the environmental documentation continues for the project. A draft PA was circulated in July 2005 along with an invitation to participate in discussions regarding the potential effects of the project on areas of traditional cultural significance, however, at this time, few tribes have opted to participate.

ADOT on behalf of FHWA would like to offer another opportunity for your tribe/community to participate in the PA and in discussions regarding potential effects to areas of traditional cultural significance. Please sign below if you would like to be included as a Concurring Party to the final PA and return to ADOT by September 2, 2005. If your office opts to participate in cultural resource consultation at a later date, ADOT/FHWA would make a good faith effort to address any concerns.

If you have any questions or concerns, please feel free to contact me at 602-712-8636 or e-mail slaine@azdot.gov.

Sincerely,

Serelle E. Laine
 Serelle E. Laine, Coordinator
 Historic Preservation Team
 Environmental & Enhancement Group
 205 South 17th Avenue Rm. 213E Mail Drop 619E
 Phoenix, Arizona 85007-3213

Evelyn Andrews
 Signature for Salt River Pima-Maricopa Concurrence

Date

cc: Dezbah Hatathli, Acting Cultural Programs Supervisor, Cultural and Environmental Services
 Kelly Washington, Acting Cultural Resources Department Director
 Hans Klose, Community Development Director
 SThomas (FHWA)



Arizona Department of Transportation
Intermodal Transportation Division
 206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Janet Napolitano
 Governor

Victor M. Mendez
 Director

Sam Eilers
 State Engineer

September 29, 2005

Dr. David Jacobs
 State Historic Preservation Office
 Arizona State Parks
 1300 West Washington
 Phoenix, Arizona 85007

RE: Project No. NH-202-D(ADY)
 TRACS No. 202L MA 054 H5764 01L
 South Mountain Transportation Corridor
 Continuing Section 106 Consultation
 Addendum Class I and Class III Survey Reports
 Eligibility Recommendations

Dear Dr. Jacobs:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. As part of this effort, our office submitted two cultural resources reports on August 26, 2005. The reports were entitled *An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck and Touchin 2005) and *An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2005). In your response letter dated September 19, 2005, you found the report adequate and provided several comments requesting clarification on the following eligibility recommendations:

- The first comment noted inconsistencies between the eligibility summary in the consultation letter and the Class I report. We have confirmed that a total of 27 previously recorded historic and prehistoric archeological sites were identified in the Class I report. Five of the sites were previously determined eligible, 7 were considered not eligible, 7 had not been previously evaluated, and the eligibility status of 8 sites is unknown.
- The second comment noted that the consultation letter neglected to mention that the Barnes Dairy and the Dad Farmstead are part of the 6100 West Dobbins Road Streetscape. We would like to confirm that the Barnes Dairy is recommended as eligible both individually and as a contributing component of the Dobbins Streetscape. In contrast, while the Dad Farmstead is recommended as not eligible as an individual property, it is recommended eligible as a contributing component of the Dobbins Streetscape.
- Third, Dr. Collins commented that the 6100 West Dobbins Road Streetscape is more appropriately eligible under Criterion A than Criterion D. We concur that the Dobbins Streetscape is eligible under A, rather than D.

Jacobs

TRACS No. 202L MA 054 H5764 01L

September 29, 2005

Page 2 of 2

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. If you find the reports adequate and agree with the eligibility recommendations, please indicate your concurrence by signing below. We also look forward to continuing consultation with your office. If you have any questions or concerns, please feel free to contact me at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely,

Ruth L. Greenspan
 Historic Preservation Specialist
 Environmental & Enhancement Group
 205 South 17th Avenue Rm. 213E Mail Drop 619E
 Phoenix, Arizona 85007-3213

Signature for SHPO Concurrence

30 Sep 05
 Date

cc:
 SThomas (FHWA)
 WVachon (FHWA)



2001 Award Recipient



Arizona Department of Transportation

Intermodal Transportation Division

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Janet Napolitano
Governor

Victor M. Mendez
Director

Sam Elters
State Engineer

August 31, 2005

Dr. Todd Bostwick, Archaeologist
City of Phoenix
Pueblo Grande Museum
4619 E. Washington
Phoenix, Arizona 85034

RE: Project No. NH-202-D(ADY)
TRACS No. 202L MA H5764 01E
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Addendum Class I and Class III Survey Reports

Dear Dr. Bostwick:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations of five alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 in west Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Land jurisdiction for the alternative alignments includes private land (5,160.7 acres) and lands administered by the Arizona State Land Department (101.4 acres), the Bureau of Land Management (35.1 acres), and the City of Phoenix Parks and Recreation (62.32 acres).

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Advisory Council on Historic Preservation (ACHP), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County, the Maricopa County Department of Transportation, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

Bostwick
August 31, 2005
Page 2 of 12

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 west of Phoenix to I-10 in west Chandler, south of the greater Phoenix metropolitan area. Alternative corridors are 1000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.

The cultural resources component of the EIS includes four technical studies:

- A Class I overview of the overall study area: "*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*" (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: "*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*" (Darling 2005). Consultation regarding adequacy of the report is on going. To date, concurrence responses have been received from SHPO (Jacobs, July 11, 2005), Bureau of Reclamation (Ellis, July 12, 2005), Bureau of Land Management (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quewakia, July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report is titled *An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*. The Class III report is titled *An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*. Both reports are enclosed for consultation and discussed below.

Addendum Class I Overview Results

The addendum Class I overview, titled *An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck and Touchin 2005), identified 27 previously recorded prehistoric and historic archaeological sites, five historical-period linear sites, and 129 historic building properties (see attached Table A). In addition, historical maps indicate that several prehistoric canal alignments pass through the study area. For the archaeological sites, five are considered eligible to the National Register of Historic Places (NRHP) under Criterion D, five sites are not eligible, nine sites have not been evaluated for eligibility, and the eligibility status of eight sites is unknown due to a lack of available information. Historically



2001 Award Recipient

Bostwick
August 31, 2005
Page 3 of 12

documented prehistoric canals in the area are viewed as potentially eligible resources that should be investigated if encountered.

The Class I study revealed five historical-period linear sites in the study area. The linear sites are considered eligible overall under Criterion A with contributing and non-contributing segments.

Of the 129 historic building properties, 25 have been previously recommended as eligible to the NRHP under Criteria A and/or C, 37 have been recommended as not eligible, and 67 have not been evaluated. Seventy-one historic building properties are in the Capital Redevelopment Area in Phoenix, an unincorporated residential area with an abundance of historic building properties. Eighteen of the historic building properties are in the Villa Verde Historic District, which is listed on the Phoenix Register of Historic Places. Although the Villa Verde properties were previously recommended as not eligible to the NRHP, they should be re-evaluated within the context of an early Phoenix suburban neighborhood.

The vast majority of cultural resources identified in the addendum Class I study area will not be affected by any of the proposed alternative alignments. Cultural resources in the W55 and W71 alignments include AZ T:11:26 (ASM), AZ T:12:4 (MNA), AZ T:12:5 (MNA), AZ T:12:10 (ASM) (Los Colinas), AZ T:12:38 (ASM), and AZ T:12:178 (ASM) (Los Aumentos). Cultural resources in the W101 alignments include AZ T:7:167 (ASM) (Grand Canal), AZ T:10:83 (ASM) (Roosevelt Canal), AZ T:11:26 (ASM), AZ T:12:4 (MNA), and AZ T:12:178 (Los Aumentos).

Addendum Class III Survey Results

An addendum survey of shifted alternative alignments, defined in December 2004, and agricultural fields that had been plowed in early 2005 since the time of the initial Class III survey conducted by the GRIC (Darling 2004), was conducted by HDR Engineering, Inc. (HDR). In addition, the addendum Class III survey included documentation of 21 historic sites not included in the initial Class III survey (Darling 2004). The results are reported in a report titled *An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2005), which is enclosed for your review and comment. One archaeological site and 21 historic sites were identified in the proposed alternative alignments (see attached Table B). The archaeological site is recommended as eligible to the NRHP under Criterion D. Two historic sites are recommended as eligible under Criterion A. Three historic sites are recommended as eligible under Criterion C. One historic site is recommended as eligible under Criteria A and B. One historic site is recommended as eligible under Criteria A and C. One historic site is recommended as eligible under Criteria A and D. One historic site is recommended as eligible under Criterion A but non-contributing within the proposed alternative alignments. Twelve historic sites are recommended as not eligible.

Archaeological Sites

- AZ T:12:221 (ASM) is a prehistoric Hohokam artifact scatter. The site is recommended as eligible to the NRHP under Criterion D for its potential to provide important information on prehistoric settlement and land use in the lower Salt River Valley near the confluence of Gila and Salt rivers.



Bostwick
August 31, 2005
Page 4 of 12

Canals

- The SRP 99th Avenue Lateral, located on the east side of South 99th Avenue and north of Lower Buckeye Road, is recommended as eligible to the NRHP under Criterion A as a rare irrigation feature that was once common in the agricultural landscape of the Salt River Valley. The lateral is being converted to an underground pipe in response to the Pecan Promenade and City of Phoenix development projects. SRP and Reclamation are currently in the process of preparing a report for the canal that documents its history and engineering, as a form of mitigation. Upon completion of these projects, the 99th Avenue Lateral will no longer be considered a contributing component of the overall SRP irrigation network.

Commercial Properties

- Mother's Restaurant at 5760 West Buckeye Road is recommended as not eligible to the NRHP due to a lack of historical significance and integrity. The original gas station is heavily modified as a result of its conversion to a restaurant in the 1970s. It no longer retains integrity of workmanship and design. Historically, the gas station was in a rural agricultural setting along a two-lane highway. Today, the property has lost its integrity of setting and feeling, as it is in a modern industrial zone with old US 80 (West Buckeye Road) widened to a five-lane urban thoroughfare.
- The Jarvis Marine Repair Shop at 5800 West Buckeye Road is recommended as not eligible to the NRHP due to its age and lack of architectural significance.

Farms

- The Hudson Farm located at 9300 South 59th Avenue is recommended as eligible to the NRHP under Criterion A as an exceptional example of a historic farmstead in Laveen. It retains a complete suite of agricultural buildings and structures from the period of significance that are in good condition and well preserved. In addition, the farmstead does not have any intrusive modern buildings or structures that would detract from its historic setting and feeling (other than a large satellite dish which could be easily removed). The farmstead's combination and overall layout of older buildings and structures, along with other contributing elements such as the mature landscaping, palm tree-lined driveways and entrance gates, provides an inclusive picture of what a working farmstead was like in Laveen during the agricultural era period of significance. The property retains integrity of location, workmanship, materials, design, and association. Furthermore, the surrounding agricultural field provides the contextual framework within which the property conveys its historic character as a farmstead. Thus, the agricultural field is an important contributing component that defines and preserves the farmstead's integrity of setting and feeling. It is recommended that the entire 38-acre parcel is eligible for the NRHP under Criterion A as an exceptional example of a historic-period Laveen farmstead. Additionally, the pair of stave silos are recognized as individually eligible to the NRHP under Criterion C, as rare examples of a once common architectural form that was a fundamental component of Laveen's historic agricultural landscape.



Bostwick
August 31, 2005
Page 5 of 12

Farmsteads

- The Anderson Farm Tenant Residences at 9901 and 9903 West Van Buren Road are recommended as not eligible to the NRHP due to a lack of historical and architectural significance.
- The Carter Farmstead at 7201 and 7215 West Broadway Road is recommended as not eligible to the NRHP. The farmstead has lost too many of its primary elements to convey a good sense of its historic character. While it provides a picturesque rural setting, it does not provide an accurate portrayal of its historic composition.
- The Cecil and Mary Colvin Farmstead located at 5139 West Estrella Road is recommended as not eligible to the NRHP because it has lost too many of its period elements to convey its historic character. The farmhouse is the only primary element remaining from the historic period; however, it lacks integrity and architectural distinction.
- The Dad Farmstead at 6102 West Dobbins Road is recommended as not eligible for the NRHP due to a lack of historical significance, architectural merit, and integrity. Individually, the farmhouse and barn have been modified and lack architectural distinction. Overall, the property fails to convey its original historic character as a working farmstead.
- The Dean Farmstead at 9445 West Broadway Road is recommended as not eligible to the NRHP due to a lack of historical and architectural significance and diminished integrity of workmanship, design, and materials. The farmhouse is heavily modified through additions and is in a general state of disrepair.
- The Maddux House at 9115 West Broadway Road is recommended as not eligible for the NRHP due to a lack of historical and architectural significance.
- The Parker Farmstead at 3606 South 83rd Avenue is recommended as not eligible due to a lack of historical and architectural significance. None of the farmstead's historic period buildings and structures remain, except for the farmhouse built in 1950, which is heavily modified with additions and generally lacks integrity of design, workmanship, and materials.
- The Pitrat Farmstead at 5901 West Elliot Road is recommended as not eligible for the NRHP due to a lack of architectural integrity and historical significance. The historical layout of the farmstead has been lost as a result of property subdivisions and new construction. The house is heavily modified from its original form through multiple additions. Although the property is consistent with a rural agricultural landscape, in its current condition, it no longer conveys an accurate representation of its historical period character.
- The Quinonez House at 9131 West Broadway Road is recommended as not eligible to the NRHP due to a lack of historical and architectural significance and diminished integrity of workmanship, design, and materials.



Bostwick
August 31, 2005
Page 6 of 12

- The Sachs-Webster Farmhouse at 7515 West Baseline Road was previously recommended as eligible for the NRHP under Criterion C as an outstanding example of the Pyramid Cottage or Neo-Classical bungalow style house. Not only is the house a rare example of a once common Territorial-period architectural style, it is also exceptional in that few homes built in Phoenix in the Pyramid Cottage style possess as many of the hallmark attributes as does the Sachs-Webster House.

Farmsteads with Dairy Components

- The Colvin-Tyson Farmstead/Barnes Dairy located at 6159 West Dobbins Road is recommended as not eligible to the NRHP as a whole because of a lack of integrity and historical significance. However, the dairy "head-to-toe" barn is recommended as individually eligible under Criterion C as a rare example of a once common architectural form that was a characteristic feature in Laveen's historic landscape and an integral component of its local economy. It is one of the few standing family-operated dairy barns in Laveen. It is also recognized as important within the broader context of the Salt River Valley's dairy industry as a surviving example of a dairy head-to-toe barn used during the height of its agricultural era.
- The Hackin Farmstead/Dairy at 10048 South 59th Avenue is recommended as not eligible to the NRHP because of a lack of integrity and historical significance. However, the dairy "flat" barn, is recommended as individually eligible under Criterion C as a rare example of a once common form that was a characteristic feature in Laveen's historic landscape and an integral component of its local economy. It is one of the few remaining family-operated dairy barns in Laveen. It is also important within the broader context of the Salt River Valley's dairy industry as a surviving example of a dairy flat barn used during the height of its agricultural era.

Feedlots

- The C.O. Pitrat & Sons Feedlot in the 6100 Block of West Elliot Road is recommended as not eligible for the NRHP because of a lack of historical and architecture significance. The feedlot is 50 years old; however, most of its operation occurred in modern times. The structures and buildings are poorly preserved and generally lack integrity.

Highways

- US 80 (AZ FF:9:17 [ASM]) is considered eligible to the NRHP under Criterion A at the national level as one of the first designated transcontinental routes and for its association with the development of the U.S. interstate transportation network. The segment within the study area has been widened and modernized and no longer retains integrity of design, workmanship, and materials. Furthermore, its integrity of setting and feeling are lost with most of the surrounding landscape transformed from rural agricultural to urban commercial/industrial. It is recommended that the segment in the study area is not eligible to the NRHP as a non-contributing component of US 80.



Bostwick
August 31, 2005
Page 7 of 12

Historic Townsites

- The historic Santa Marie Townsite, located at the southwest corner of Lower Buckeye Road and 83rd Avenue, is recommended as eligible to the NRHP under Criteria A and B. The unincorporated townsite is a living example of an historic, rural Hispanic agricultural community in the Salt River Valley. Communities such as Santa Maria had an important role in the development and operation of the Valley's agricultural industry throughout the 20th century. In addition, the townsite has an association with Khattar Joseph Nackard, an Arizona businessman who had an influential role developing and shaping the State's economic and commercial future. As such, it is recommended that the Santa Marie Townsite is eligible for the NRHP under Criteria A and B.

Railroads

- The Southern Pacific Railroad Wellton-Phoenix-Eloy Main Line (AZ T:10:84 [ASM]) is recommended as eligible to the NRHP for its association with the development of Arizona's railroad network. The railroad has been maintained and upgraded over the years and remains an important component of Arizona's transportation network.

Streetscapes

- The 6100 Block West Dobbins Road Streetscape is recommended as eligible to the NRHP under Criteria A and D as an example and reflection of the lower Salt River Valley's agricultural past. In contrast to a more common, barren rural streetscape defined by a two-lane road passing between broad, open agricultural fields, the 6100 Block contains a suite of rural agricultural elements that convey a strong sense of what rural life was like in Arizona in the early to mid 1900s; (i.e., it captures more of the human element). Rural streetscapes are becoming increasingly rare in the lower Salt River Valley, as agricultural communities are replaced by urban development. It is recommended that the 6100 Block West Dobbins Road Streetscape is eligible to the NRHP under Criteria A and D, not only for its association with Arizona's early agricultural development, but more so for its information potential to provide future Arizonans with an idea of what rural agricultural life was like in the lower Salt River Valley during the early years of statehood.

All sites are located on private land, except for the Sachs-Webster Farmhouse (7515 West Baseline Road) – Flood Control District Maricopa County; SRP 99th Avenue Lateral – Bureau of Reclamation/Salt River Project; US 80/ AZ FF:9:17 (ASM) – City of Phoenix, and the 6100 Block West Dobbins Road Streetscape – City of Phoenix. FHWA/ADOT is currently consulting with these agencies regarding the eligibility of these sites located on their land.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed Class I overview and Class III survey report and information provided in this letter. If you find the reports



Bostwick
August 31, 2005
Page 8 of 12

adequate and agree with the eligibility recommendations, please indicate your concurrence by signing below. We also look forward to continuing consultation with your office. The final Programmatic Agreement is being completed and will be submitted for signature in September 2005. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail RGreenspan@azdot.gov.

Sincerely,

Serelle E. Laine, Coordinator
Historic Preservation Team
Environmental & Enhancement Group
205 South 17th Avenue Rm. 213E Mail Drop 619E
Phoenix, Arizona 85007-3213

Enclosures

Signature for City of Phoenix Concurrence
with revisions

11-1-05
Date

cc: SThomas (FHWA); WVachon (FHWA)



Table A. Addendum Class I Overview Report Eligibility and Management Summary.

Alignments	Site	Type	Location	Jurisdiction	NRHP Eligibility (Criterion)	Management Recommendation
W55/W71	AZ T:11:26 (ASM)	Hohokam Artifact Scatter	T1N, R1E, S4	ADOT	Not Eligible	None
	AZ T:12:4 (MNA)	Hohokam Artifact Scatter	T1N, R2E, S6	ADOT, Private	Not Eligible	None
	AZ T:12:5 (MNA)	Hohokam Artifact Scatter	T1N, R2E, S5	ADOT, Private	Not Eligible	None
	AZ T:12:10 (ASM) Las Colinas	Hohokam Village	T2N, R2E, S36; T1N, R2E, S1, 2, 11	ADOT, Private	Eligible (D)	Avoid, or else mitigate adverse effects
	AZ T:12:38 (ASM)	Hohokam Village	T1N, R2E, S3	ADOT, Private	Eligible (D)	Avoid, or else mitigate adverse effects
	AZ T:12:178 (ASM) Los Aumentos	Hohokam Village	T1N, R1E, S2	ADOT, Private	Eligible (D)	Avoid, or else mitigate adverse effects
W101 Alignments ¹	AZ T:7:167 (ASM) Grand Canal	Canal	T2N,R1E, S9, 16	Reclamation	Eligible (A, C)	Avoid, or else mitigate adverse effects
	AZ T:10:83 (ASM) Roosevelt Canal	Canal	T1N, R1E, S3, 4	Private	Eligible (A, C)	Avoid, or else mitigate adverse effects
	AZ T:11:26 (ASM)	Hohokam Artifact Scatter	T1N, R1E, S4	ADOT,	Not Eligible	None
	AZ T:12:4 (MNA)	Hohokam Artifact Scatter	T1N, R2E, S6	ADOT, Private	Not Eligible	None
	AZ T:12:178 (ASM) Los Aumentos	Hohokam Village	T1N, R1E, S2	ADOT, Private	Eligible (D)	Avoid, or else mitigate adverse effects

¹ = Includes alignments W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, W101EFR

Bostwick
August 31, 2005
Page 10 of 12

Table B. Addendum Class III Survey Report Eligibility and Management Summary.

Name	Address	Type	Newly (N)/Previously (P) Recorded	Alignment	USGS 7.5' Map	Township, Range, Section	Ownership	NRHP Eligibility Recommendation	Management Recommendation
AZ T:12:221 (ASM)	n/a	Prehistoric Scatter	N	W55	Fowler	T1N, R2E, S31	Private	Eligible (D)	Avoid, or else mitigate
6100 Block West Dobbins Road Streetscape	6100 Block W. Dobbins Rd.	Rural Streetscape	N	W55	Laveen	T1S, R2E, S6,7	Private, Phoenix	Eligible (A,D)	Avoid, or else mitigate
Anderson Farm Tenant Residences	9901 and 9903 W. Van Buren Rd.	Tenant Residents	N	W101 (all)	Tolleson	T1N, R1E, S8	Private	Not Eligible	None
C. O. Pitrat & Sons Feedlot	6100 Block W. Elliot Rd.	Feedlot	N	W71, W101 (all)	Laveen	T1S, R2E, S18	Private	Not Eligible	None
Carter Farmstead	7201 and 7215 W. Broadway Rd.	Farmstead	N	W71	Fowler	T1N, R1E, S25	Private	Not Eligible	None
Cecil and Mary Colvin Farmstead	5139 W. Estrella Rd.	Farmstead	N	None ¹	Laveen	T1S, R2E, S20	Private	Not Eligible	None
Colvin-Tyson Farmstead/Barnes Dairy	6159 W. Dobbins Rd.	Farmstead/Dairy	N	W55	Laveen	T1S, R2E, S7	Private	Farmstead: Not Eligible; Dairy Barn: Eligible (C); contributing elements to 6100 Block Streetscape	Avoid dairy barn, or else mitigate; avoid portion within 6100 Block Streetscape boundaries, or else mitigate



Name	Address	Type	Newly (N)/Previously (P) Recorded	Alignment	USGS 7.5' Map	Township, Range, Section	Ownership	NRHP Eligibility Recommendation	Management Recommendation
Dad Farmstead	6102 W. Dobbins Rd.	Farmstead	N	W55	Laveen	T1S, R2E, S6	Private	Farmstead: Not Eligible; contributing element to 6100 Block Streetscape	Avoid portion within 6100 Block Streetscape boundaries, or else mitigate impacts to streetscape
Dean Farmstead	9445 W. Broadway Rd.	Farmstead	N	W101 (all)	Tolleson	T1N, R1E, S28	Private	Not Eligible	Avoid
Hackin Farmstead/Dairy	100048 S. 59 th Ave.	Farmstead/Dairy	N	None ²	Laveen	T1N, R1E, S7	Private	Farmstead: Not Eligible; Dairy Barn: Eligible (C)	Avoid dairy barn, or else mitigate
Hudson Farm	9300 S. 59 th Ave.	Farm	N	W55	Laveen	T1S, R1E, S7	Private	Farm: Eligible (A); Silos: Eligible (C)	Avoid, or else mitigate
Jarvis Marine Repair Shop	5800 W. Buckeye Rd.	Commercial Building	N	W55	Fowler	T1N, R2E, S8	Private	Not Eligible	None
Maddux House	9115 W. Broadway Rd.	Farmhouse	N	W101 (all)	Tolleson	T1N, R1E, S28	Private	Not Eligible	None
Mother's Restaurant	5760 W. Buckeye Road	Commercial Building	N	W55	Fowler	T1N, R2E, S8	Private	Not Eligible	None
Parker Farmstead	3606 S. 83 rd Ave.	Farmstead	N	W101EPR, W101EFR	Fowler	T1N, R1E, S22	Private	Not Eligible	None
Pitrat Farmstead	5901 W. Elliot Rd.	Farmstead	N	None ³	Fowler	T1S, R2E, S18	Private	Not Eligible	None



Name	Address	Type	Newly (N)/Previously (P) Recorded	Alignment	USGS 7.5' Map	Township, Range, Section	Ownership	NRHP Eligibility Recommendation	Management Recommendation
Quinonez House	9131 W. Broadway Rd.	Farmhouse	N	W101 (all)	Tolleson	T1N, R1E, S28	Private	Not Eligible	None
Sachs-Webster Farmhouse	7515 W. Baseline Rd.	Farmhouse	P	W101 (all)	Tolleson	T1S, R1E, Ss	FCDMC	Eligible (C)	Avoid, or else mitigate
Santa Marie Townsite	Lower Buckeye Rd. and S. 83 rd Ave.	Townsite	N	W71	Fowler	T1N, R1E, S24	Private	Eligible (A,B)	Avoid, or else mitigate
SPRR Wellton- Phoenix-Eloy Main Line	UPRR R/W	Railroad	P	All	Fowler, Tolleson	T1N, R1E, S8,9,12; T1N, R2E, S8	UPRR	Eligible (A)	Avoid, or else mitigate
SRP 99 th Avenue Lateral	99 th Ave. and Lower Buckeye Rd.	Irrigation Canal	P	W101W99	Tolleson	T1N, R1E, S16	SRP/ Reclamation	Eligible (A)	Avoid, or else mitigate
US 80 (AZ FF:9:17 [ASM])	West Buckeye Road	Highway	P	All	Fowler, Tolleson	T1N, R1E, S8,9,12,13,16,17; T1N, R2E, S8, 17	Phoenix	Eligible (A) (non-contributing)	None

Table Notes:
1) all the alignments cross the property parcel but do not intersect the farmstead.
2) W55 crosses the property parcel but misses the farmstead and dairy barn;
3) All the alternative alignment pass within about 100 m of the farmstead but do not directly impact it.





Archaeology Section
Pueblo Grande Museum
4619 E. Washington St.
Phoenix, AZ 85034

Report Review Form

Project No.: ADOT
Report Title: Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona
Draft: X
Author: Brodbeck and Touchin
Action: Revise & Resubmit

Date Report Submitted: 9/26/05

Final:
Firm: HDR

Comments:

- Under Agency on the Abstract page (iii): ASLD, BLM and the COP Parks and Recreation Department should also be in this section because they are listed as having jurisdiction for the alternative alignments on the first page of the cover letter of this report from Serelle E. Laine for ADOT. Please revise this.
- Under Location on the Abstract page (iii), partial paragraph at the bottom of the page, last line and partial paragraph at the top of page iv, first line: According to Figures 2-7, Sections 3 to 5, 8, 9, 16, 17, 20, 21, 28, 29, and 31 to 36 should read Sections 3 to 5, 8 to 10, 15 to 17, 20 to 22, 27 to 29, and 31 to 36. Also, Sections 31 to 36 of Township 2 North, Range 1 West and Sections 1 to 12 of Township 1 North, Range 1 West should be added to this section. Please fix this here and under the Introduction, page 1, final paragraph.
- Under List of Sites on the W55 and W71 Alignments on the Abstract page (iv), final line: *AZ T:5: (ASM)* should read *AZ T:12:5(MNA)* here and everywhere it occurs in the report.
- Under Management Recommendations on the Abstract page (v), final paragraph and under Summary and Management Recommendations, page 63, partial paragraph at the bottom of the page, and partial paragraph at the top of page 64: Add the following sentence at the end of each paragraph: *If the resources are identified within the City of Phoenix, the City of Phoenix Archaeology Office should also be contacted and allowed time to properly assess the materials.*
- On the Table of Contents page (vi), List of Figures: *v* should read *viii*.
- On the Table of Contents page (vi), List of Tables: *vi* should read *ix*.
- Under List of Figures, page viii: *Figure 4* should read *Figure 3*. As a result, all of the remaining figure numbers are off by one both here and in the text of the report. Please revise this here and wherever it occurs in the report.
- Under the Introduction, page 1, initial paragraph, line 3: Omit *is a* between *This* and *federally-funded*.
- Under Chapter 2: Environmental Context, page 4, initial paragraph, line 4: *Aqua Fria* should read *Agua Fria*.

Saving the past for the future...

- In Table 1, page 6: Please state whose cultural chronology you are basing the table on (Dean [1991])?
- In Table 1, page 6: You place the Vahki phase before the Pioneer period, yet under Early Formative and Pioneer Periods, page 8, partial paragraph at the bottom of the page, initial sentence, you state that the Vahki phase is a part of the Pioneer period. Please revise this.
- Under Paleo-Indian Period, page 7, line 4: *kills sites* should read *kill sites*.
- Under Paleo-Indian Period, page 7, line 10: You state that a single specimen was recovered from the northern edge of the basin. Please clarify which basin you are referring to. Also, for more information on Paleoindian finds in the area, please see:

North, Chris, Michael S. Foster, John M. Lindly and Douglas R. Mitchell
2005 A Newly Discovered Clovis Point from the Phoenix Basin and an Update on Arizona Clovis Point Attributes. *Kiva* 70(3): 293-307.

- Under Archaic Period, page 7, initial paragraph, line 9: Please move the dash from after *assemblages* to after *sedentism*.
- Under Archaic Period, page 8, partial paragraph at the top of the page, first and second lines: Please add the following report to your list of work done on Archaic sites in the Phoenix Basin:

Hackbarth, Mark R.
1998 *Archaic and Hohokam Occupation of the Mayo Boulevard Project Area in Northeast Phoenix, Arizona*. Pueblo Grande Museum Anthropological Papers No. 8.

- Under Colonial Period, page 10, partial paragraph at the top of the page, line 6: Insert the word *a* after *become*.
- Under Colonial Period, page 10, final paragraph, lines 4-5: Doyel (1978), Elson et al. (1995), Haury (1932) and Mitchell (1986) are not in the Referneces Cited section. Please revise this.
- Under Classic Period, page 12, partial paragraph at the top of the page, line 3: Howard (1987) is not in the References Cited section. Please revise this.
- Under Classic Period, page 12, partial paragraph at the top of the page, second complete sentence: For information on the platform mound at Pueblo Grande, please see:

Downum, Christian and Todd Bostwick
2003 The Platform Mound. In *Centuries of Decline during the Hohokam Classic Period at Pueblo Grande*, edited by David Abbott, pp. 166-200. University of Arizona Press, Tucson.

- Under Historic Period, page 13, line 2: *id divided* should read *is divided*.
- Under The Hispanic Era (A.D. 1694-1853), page 14, partial paragraph at the bottom of the page, initial sentence: It is not clear what group of people are you referring to


when you mention the word *Western*. Do you mean the Western Apache? Please revise this.

- Under The Hispanic Era (A.D. 1694-1853), page 15, final paragraph, final sentence: Mention the Mexican-American War and the Treaty of Guadalupe-Hidalgo (1848) as well.
- Under Chapter 4: Regulatory Context, page 17, paragraph 2, line 5: Please omit the comma after *NHPA* and add a period.
- Under Chapter 4: Regulatory Context, page 17, partial paragraph at the bottom of the page, initial line: *State Historic Preservation of 1982* seems incomplete. Do you mean *State Historic Preservation Act of 1982*?
- Under Chapter 5: Results, page 19, paragraph 2, line 2: You state that 76 projects were surveys, yet more than 80 surveys are listed in Table 2. Please revise this.
- Under Chapter 5: Results, page 19; paragraph 4, line 2 and under Chapter 6: Summary and Management Recommendations, page 63, paragraphs 2 and 4: You state that there were 129 historic buildings, yet 130 are listed in Table 7.
- Under Chapter 5: Results, page 19, paragraph 4, sentence 3: You state that five archaeological sites are not eligible, yet seven sites are listed as eligible in Table 5. Also, you state that nine archaeological sites have not been evaluated for eligibility, yet seven sites are listed as not evaluated in Table 5. Please revise this.
- In Table 2, page 20: The Janus Assoc. (1987b) survey is not shown in Figure 5. Please revise this.
- In Table 2, page 21: The Schroeder (1995) survey is not shown in Figure 5. Please revise this. Also, *Stubbing and Mitchell* should read *Stubing and Mitchell*.
- In Table 2, page 22: The Hart (1999) survey is not shown in Figure 3. Please revise this.
- In Table 2, page 23: Please indicate which Touchin and Brodbeck (2003) you mean (a or b).
- In Table 3, page 24: The projects listed for the Excavations at Las Colinas, the Clark and Henderson (2001) project and the Boston and Ryan (2002) project are not shown in Figure 5. Also, the Shepard (1998) project is not shown in Figure 3. Please revise this.
- In Table 4, page 25: The Marshall (1996) project is not shown in Figure 5. Please revise this.
- In Table 4, page 25: The location of the Hart (2001a) project should read *T2N, R2E, S32*.
- On Figure 2, page 26: Four UTMs must be displayed. Please revise this both here and throughout the report.
- On Figure 4, page 28: *Hart 2001c* should read *Hart 2001b*.
- On Figure 5, page 29: *Hart 2001d* should read *Hart 2001c*.
- In the caption of Table 5, page 32: *Previous* should read *Previously*.
- In Table 5, page 32: You mention the site labeled "ASU" and cite our base map as a reference, but this site is not labeled "ASU" on any of our maps. On whose records is this site labeled ASU?
- In Table 5, page 32: According to our records, Midvale-6 and AZ T:12:28b(ASU) are two separate sites. Please revise this.

- In Table 5, page 32: Site AZ T:12:184(ASM) should be placed in the Site Number column for the Fangmeier (2002) project.
- In Table 5, page 33: Marshall (1997c) is not in the References Cited section. Please revise this.
- In Table 5, page 34, References for Las Colinas: Hammack (1981) is Hammack and Sullivan (1981) in the References Cited section. Heathington (1985) is Heathington et al. (1985) in the References Cited section. Finally, Gregory (1988b) is not in the References Cited section. Please revise this.
- In Table 5, page 34: Site AZ T:12:13(PG) is located far from this project area. It is located in T1S R2E S3. There was originally some confusion on the PGM site card (which has been resolved) as to whether this site is located in T1N or T1S, which may have caused it to be erroneously placed in T1N on SHPO inventory 1210.
- In Table 5, page 35, References for AZ T:12:38(ASM): Please include the other report references that were listed in the site file you obtained when you conducted your search at PGM, especially Layhe (1988), Excavations at AZ T:12:38 (ASM). In *The 1982-1984 Excavations at Las Colinas: The Site and Its Features*.
- In Table 5, page 35: *O'Brien et al. 1997* should read *O'Brien et al. 1987*.
- In Table 6, page 36: Please indicate which Touchin and Brodbeck (2003) you are referring to (a or b).
- On Figure 9, page 47: Many sites are labeled but not displayed. Please revise this both here and in other figures where this occurs.
- On Figure 9, page 47: The site boundary of Los Aumentos does not match that in our database. Please explain any discrepancies in the way that this site is plotted.
- Under Archaeological Sites (NRHP-Ineligible), page 58, paragraph 2, initial sentence: You state that sites AZ T:12:4(MNA) and AZ T:12:5(MNA) have not been formally evaluated for eligibility and are located within the proposed alignments. Since there is federal involvement, these sites will need to be formally evaluated for eligibility if they will be impacted by the project.
- Under References Cited: Please insert spaces between the following reports: ASM (1998) and Basso (1983); McDermott(2003) and McDonald (1974); Rosenberg (1983a) and Rosenberg (1983b);
- Under References Cited, page 69: The Burden (2002) report that was mentioned in the cover letter from ADOT is not in the References Cited Section (*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*).

Recommendations:

Please revise the report accordingly and send one final bound copy of this report to the City of Phoenix Archaeology Office. Please send the appropriate number of final bound copies of this report to the lead federal agency. They will then forward copies to all consulting parties.

Reviewed By: Robert A. Serocki Jr. and
Todd W. Bostwick, Ph.D. 

Date: 11/1/05

Collection to be submitted: N/A
Remarks:



Archaeology Section
Pueblo Grande Museum
4619 E. Washington St.
Phoenix, AZ 85034

Report Review Form

Project No.: ADOT

Date Report Submitted: 9/26/05

Report Title: An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona

Draft: X

Final:

Author: Brodbeck

Firm: HDR

Action: Revise & Resubmit

Comments:

- Under Land Jurisdiction on the Abstract page (iii): FCDMC should also be in this section because it is listed as a land owner in the second table in the Abstract on page iv. Please revise this.
- Under Eligibility and Management Recommendations on the Abstract page (v), paragraph 2, initial line: You mention an archaeological site. Please clarify if this site is historic or prehistoric.
- Under Eligibility and Management Recommendations on the Abstract page (v), final paragraph and under Management Summary, page 150, final paragraph: Add the following sentence at the end of each paragraph: *If the resources are identified within the City of Phoenix, the City of Phoenix Archaeology Office should also be contacted and allowed time to properly assess the materials.*
- Under Feedlots on the Abstract page (viii), line 2 and under Feedlots, page 156, line 2: *architecture* should read *architectural*.
- Under Historic Townsites on the Abstract page (ix) and under Historic Townsites, page 157: If you will use both Santa Maria and Santa Marie to describe the same township, please explain the difference as you do on page 110.
- Under Project Background, page 1, line 14: The publication date for MAG (2003) is shown as 2002 in the References Cited section. Please revise this.
- In Table 1.1, page 4: Survey Area 5 looks much larger than 10 acres in Figure 1.5. Please revise this.
- On Figure 1.4, page 6: Please include the line that identifies quad map boundaries in the legend both here and in any figures where it occurs.
- Under Chapter 3: Cultural Context, page 16, lines 4-5: Please enclose the time period of the Formative Period in parentheses, as with the other major stages.

Saving the past for the future...

- Under Paleo-Indian Period, page 16, second-to-last line: For more information on Paleoindian finds in the area, please see:

North, Chris, Michael S. Foster, John M. Lindly and Douglas R. Mitchell
2005 A Newly Discovered Clovis Point from the Phoenix Basin and an Update on Arizona Clovis Point Attributes. *Kiva* 70(3): 293-307.

- Under Archaic Period, page 16, initial paragraph, line 9: Please move the dash from after *assemblages* to after *sedentism*.
- Under Archaic Period, page 17, initial paragraph, lines 3-4: Please add the following report to your list of work done on Archaic sites in the Phoenix Basin:

Hackbarth, Mark R.
1998 *Archaic and Hohokam Occupation of the Mayo Boulevard Project Area in Northeast Phoenix, Arizona*. Pueblo Grande Museum Anthropological Papers No. 8.

- Under Colonial Period, page 19, partial paragraph at the top of the page, line 8: Insert the word *a* after *become*.
- Under Colonial Period, page 19, final paragraph, line 5: Mitchell (1986) is not in the References Cited section. Please revise this.
- Under Classic Period, page 21, partial paragraph at the top of the page, third complete sentence: For information on the platform mound at Pueblo Grande, please see:

Downum, Christian and Todd Bostwick
2003 The Platform Mound. In *Centuries of Decline during the Hohokam Classic Period at Pueblo Grande*, edited by David Abbott, pp. 166-200. University of Arizona Press, Tucson.

- Under Classic Period, page 21, final paragraph, line 12: Sires (1983) is not in the References Cited section. Please revise this.
- Under The Hispanic Era (A.D. 1694-1853), page 23, partial paragraph at the bottom of the page, initial sentence: It is not clear what group of people are you referring to when you mention the word *Western*. Do you mean the Western Apache? Please revise this.
- Under The Hispanic Era (A.D. 1694-1853), page 24, final paragraph, final sentence: Mention the Mexican-American War and the Treaty of Guadalupe-Hidalgo (1848) as well.
- Under Chapter 4: Regulatory Context, page 26, paragraph 2, line 5: Omit the comma after *NHPA* and add a period.
- Under Chapter 4: Regulatory Context, page 26, partial paragraph at the bottom of the page, initial line: *State Historic Preservation of 1982* seems incomplete. Do you mean *State Historic Preservation Act of 1982*?
- Under Chapter 5: Methodology, page 28, initial paragraph, line 3: In addition to referring readers to the Burden (2002) report, refer readers to the Addendum Class I report that was recently completed as well (Brodbeck and Touchin 2005).

- Under NRHP Eligibility and Management Recommendations for site AZ T:12:221(ASM), page 33, initial sentence: Please insert the word *potentially* before *eligible*. Also, this site needs to be formally evaluated for eligibility.
- On Figure 6.4, page 34: The legend gives an aerial photo date of Summer, 2003, yet there is no aerial photo in this figure. Please revise this.
- Under References Cited, page 159: The Burden (2002) report that was mentioned in the cover letter of this report from Serelle E. Laine for ADOT is not in the References Cited Section (*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*).
- Under References Cited, page 162, Elson et al. (1995): 995 should read 1995.

Recommendations:

The City of Phoenix Archaeology Office concurs with the recommendation that archaeological and historic sites determined eligible for the NRHP should be avoided if possible. If avoidance is not possible, then any adverse effects should be mitigated. Please revise the report accordingly and send one final bound copy of this report to the City of Phoenix Archaeology Office. Please send the appropriate number of final bound copies of this report to the lead federal agency. They will then forward copies to all consulting parties.

Reviewed By: Robert A. Serocki Jr. and
Todd W. Bostwick, Ph.D.

Date: 11/1/05

Collection to be submitted: No
Remarks: No collections were made.



Janet Napolitano
Governor

Victor M. Mendez
Director

Arizona Department of Transportation
Intermodal Transportation Division
206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

David P. Jankofsky
Deputy Director

August 17, 2005

Peter Steere, Program Manager
Joe Joaquin, Cultural Resource Specialist
Tohono O'odham Nation
Cultural Affairs Office
P.O. Box 837
Sells, Arizona 85634

RE: Project No: NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Draft Programmatic Agreement follow-up

Dear Sirs:

The Arizona Department of Transportation (ADOT) on behalf of the Federal Highway Administration (FHWA) is following up on our recent request for input on the draft Programmatic Agreement (PA) for the South Mountain Corridor freeway project (letter from Hollis, FHWA, July 7, 2005). ADOT/FHWA are in the process of finalizing the South Mountain Corridor PA to address project effects as the environmental documentation continues for the project. A draft PA was circulated in July 2005 along with an invitation to participate in discussions regarding the potential effects of the project on areas of traditional cultural significance, however, at this time, few tribes have opted to participate.

ADOT on behalf of FHWA would like to offer another opportunity for your tribe/community to participate in the PA and in discussions regarding potential effects to areas of traditional cultural significance. Please sign below if you would like to be included as a Concurring Party to the final PA and return to ADOT by September 2, 2005. If your office opts to participate in cultural resource consultation at a later date, ADOT/FHWA would make a good faith effort to address any concerns.

If you have any questions or concerns, please feel free to contact me at 602-712-8636 or e-mail slaine@azdot.gov.

Sincerely,

Serelle E. Laine, Coordinator
Historic Preservation Team
Environmental & Enhancement Group
205 South 17th Avenue Rm. 213E Mail Drop 619E
Phoenix, Arizona 85007-3213

Signature for Tohono O'odham Concurrence

11-8-05

Date

cc: SThomas (FHWA)



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-2264

November 22, 2005

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Section 106 Consultation
Traditional Cultural Places

Mr. Richard P. Narcia, Governor
Gila River Indian Community
P.O. Box 97
Sacaton, Arizona 85247

Dear Governor Narcia:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) appreciate your letter dated September 30, 2005 responding to our consultation regarding traditional cultural places. This consultation is part of the process of preparing an Environmental Impact Statement (EIS) for the South Mountain Freeway project. Your letter expressed concern for the protection of 21 archaeological sites and three areas of traditional cultural importance—South Mountain itself, the Villa Buena site, and the Pueblo del Alamo site. The letter also requested that FHWA take appropriate mitigation measures to address adverse effects to the physical integrity of these traditional cultural places, which are considered sacred sites. The purpose of this letter is to request more specific information regarding the boundaries and cultural importance of these properties so that mitigation strategies can be developed within the context of Section 106 consultations of the National Historic Preservation Act (36 CFR Part 800).

Under the National Historic Preservation Act (NHPA), Traditional Cultural Properties (TCP's) are defined as historic sites eligible for inclusion in the National Register because of their association with cultural practices or beliefs of a living community that (a) are rooted in the community's history, and (b) are important in maintaining the continuing cultural identity of the community (National Register Bulletin Number 38). Historic sites must exhibit four attributes: an age greater than 50 years; existence as a tangible property; integrity in relationship to the transmission and retention of cultural beliefs or the performance of ceremonial practices; and integrity of condition wherein their traditional cultural significance has not been reduced through alteration of location, setting, design or materials. A TCP may be eligible for the National Register under one or more of the following Criteria: (A) association with events that have made a significant contribution to the broad patterns of history; (B) association with the lives of persons significant in the past; (C) the embodiment of the distinctive characteristics of a type, period, or method of construction; and (D) history of yielding, potential to yield, information important in prehistory or history (National Register Bulletin Number 38).

Your letter dated September 30, 2005 identifies South Mountain as a TCP and explains how it is rooted in the community's history and is important in maintaining the continuing cultural identity of the Akimel O'odham and Pee Posh. In addition, it has been demonstrated that South Mountain has been used by Akimel O'odham and Pee Posh for religious and ceremonial activities for more than 50 years and it retains integrity in terms of condition and the transmission and retention of cultural beliefs. FHWA and



ADOT recommend that South Mountain is eligible to the National Register as a TCP under Criterion A for its association with the broad patterns of Akimel O'odham and Pee Posh ceremonial and religious activity that is rooted in their history and integral to continuation of their cultural identity. To finalize this recommendation and fulfill FHWA's Section 106 obligations, we need to be able to define the South Mountain TCP as "a tangible property," as defined by the NHPA. Therefore, FHWA requests that the Gila River Indian Community provide a map marked with the physical boundaries of the South Mountain TCP, in order to assist with our environmental issues assessment.

Your letter also identifies two archaeological sites as TCP's, Villa Buena (AZ T:12:9 ASM) and Pueblo del Alamo (AZ T:12:52 ASM); however, no information is provided about the association of these sites with cultural practices or beliefs of the community that are rooted in the community's history and are important in maintaining the continuing cultural identity of the community. FHWA recommends the two archaeological sites as eligible for the NRHP under Criterion D. Additional research would be required to evaluate their status as TCP's. FHWA recommends that a TCP evaluation be prepared to address the sites' TCP eligibility, so FHWA can proceed appropriately. Any information provided in a TCP study would be kept strictly confidential and not included in any documents released to the public.

FHWA and ADOT appreciate the efforts of the Gila River Indian Community in addressing these complex issues and are committed to continuing consultation with the Community on these and other issues relating to this project. We are grateful for your efforts in providing a tangible boundary for the South Mountain TCP so that we can move forward with our legal obligations.

Please review the information provided in this letter. If you agree that a TCP evaluation would be appropriate to evaluate the eligibility of Villa Buena (AZ T:12:9 ASM) and Pueblo del Alamo (AZ T:12:52 ASM) for the National Register as TCP's, please indicate your concurrence by signing below. We look forward to continuing consultation with your office. If you have any question or concerns, please do not hesitate to call Steve Thomas at 602-379-3645 ext. 117 or email steve.thomas@fhwa.dot.gov.

Sincerely,

STEPHEN D. THOMAS

Robert E. Hollis
Division Administrator

Signature for Gila River Indian Community Concurrence

Date

cc:
Barnaby Lewis, Cultural Resource Specialist, Gila River Indian Community, P.O. Box E, Sacaton, AZ 85247
John C. Ravesloot, Coordinator, Cultural Resource Management Program, Gila River Indian Community, P.O. Box 2140, Sacaton, AZ 85247
Sandra Shade, Director, Department of Transportation, Gila River Indian Community, P.O. Box 97, Sacaton, AZ 85247
SThomas, BVachon, KDavis, REllis (619E), RGreenspan (619E)
SDThomas:cdm



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-2264

November 30, 2005

In Reply Refer To: HA-AZ
NH-202-D (ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Section 106 Consultation
Programmatic Agreement

Mr. Richard P. Narcia, Governor
Gila River Indian Community
P.O. Box 97
Sacaton, Arizona 85247

Dear Governor Narcia:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are in the process of finalizing the South Mountain Corridor Programmatic Agreement (PA) to address project effects as the environmental documentation continues for the project. A draft PA was circulated in July 2005. At this time, FHWA is following up on our previous request for participation in the PA for the South Mountain Corridor freeway project (letter from Hollis, FHWA, July 7, 2005). FHWA

FHWA would like to offer another opportunity for your tribe/community to participate in the PA. Please sign below if you would like to be included as a Concurring Party to the PA and return to FHWA by December 23, 2005. If your office opts to participate in cultural resource consultation at a later date, FHWA would make a good faith effort to address any concerns you may have. We look forward to continuing consultation with your office. If you have any question or concerns, please do not hesitate to call Steve Thomas at 602-379-3645 x 117 or email: Steve.Thomas@fhwa.dot.gov.

Sincerely,

STEPHEN D. THOMAS

Robert E. Hollis
Division Administrator

Signature for GRIC Concurrence

Date

cc:

Barnaby V. Lewis, Cultural Resource Specialist, GRIC, P.O. Box E, Sacaton, AZ 85247
John C. Raveslout, Coordinator, Cultural Resource Management Program, GRIC, P.O. Box 2140, Sacaton, AZ 85247
Sandra Shade, Director, Department of Transportation, GRIC, P.O. Box 97, Sacaton, AZ 85247
SThomas, RGreenspan (619E), Rellis (619E)
SDThomas:cdm



Preserving America's Heritage

December 27, 2005

Mr. Robert E. Hollis
Division Administrator
Federal Highway Administration
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, AZ 85004-2264

REF: Proposed South Mountain Transportation Corridor Project
Maricopa County, Arizona

Dear Mr. Hollis:

The ACHP received your notification and supporting documentation regarding the adverse effects of the referenced project on properties listed on and eligible for listing on the National Register of Historic Places. Based upon the information you provided, we do not believe that our participation in consultation to resolve adverse effects is needed. However, should circumstances change and you determine that our participation is required, please notify us. Pursuant to 36 CFR 800.6(b)(iv), you will need to file the final Memorandum of Agreement and related documentation at the conclusion of the consultation process. The filing of the Agreement with us is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require further assistance, please contact Carol Legard, FHWA Liaison, at 202-606-8503.

Sincerely,

Raymond V. Wallace

Raymond V. Wallace
Historic Preservation Technician
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 809 • Washington, DC 20004
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

2006 JAN -5 PM 2:39



Janet Napolitano
Governor

Victor M. Mendez
Director

Arizona Department of Transportation

Intermodal Transportation Division

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Sam Elters
Deputy Director

January 12, 2006

Dr. David Jacobs
State Historic Preservation Office
Arizona State Parks
1300 West Washington
Phoenix, Arizona 85007

RE: Project No. NH-202-D(ADY)
TRACS No. 202L MA H5764
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Class III Survey Report Eligibility Recommendations

Dear Dr. Jacobs:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. As part of this effort, we submitted a Class III cultural resources survey report on July 1, 2005 prepared by the Gila River Indian Community's (GRIC) Cultural Resource Management Program (CRMP). The report was titled *A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona* (Darling 2005). In your response letter dated July 11, 2005, you provided several comments regarding the treatment of isolated occurrences (IO) and on the Programmatic Agreement being prepared for the project. The purpose of this letter is to address the IO comments and request concurrence on the eligibility recommendations for the archaeological sites that were provided in the report (Darling 2005).

Isolated Occurrences

In your letter you noted that the report grouped IOs into 12 clusters in "areas where numerous artifacts co-occur but in concentrations less than would merit an archaeological site designation (Darling 2005:4-13.)" None of the areas with IOs has high enough artifact densities to meet standard site definition criteria. In fact, the term "cluster" is somewhat misapplied in the report. For example, IO Cluster 4 consists of six artifacts in a roughly 20-acre area; IO 6 has 17 artifacts in a 40-acre area; and, IO Cluster 7 consists of six artifacts in an approximately 15-acre area. The other IO "clusters" have similarly low artifact densities.

In your letter you also pointed out that the report notes that some of the IO Clusters are associated with prehistoric trails and trail sites near South Mountain with the additional note that some of the trails continue to be used by GRIC today. It should be pointed out that not all IOs in the study area are associated with trails, and in fact, at this point the relationships of the IOs with the trails and other cultural uses of South Mountain have not been investigated beyond collecting basic inventory and location information. ADOT and FHWA recognize that while the IOs are not individually considered eligible to the National Register of Historic Places (NRHP), they are an important component to

Jacobs

TRACS No. 202L MA 054 H5765 01L

January 12, 2006

Page 2 of 3

understanding the region's overall cultural pattern of prehistoric and historic use. ADOT and FHWA agree that proper mitigation of impacts to the cultural resources in the South Mountain Freeway corridor should include considerations of "non-site" areas. With this in mind, the IO's that are in proximity to other IOs, or in proximity to defined sites or trails, were called out in the report so that further investigation of them could be considered in any treatment plans that might be developed in the future. However, based on survey data alone, these IOs do not meet the ASM criteria for sites, or the NRHP criteria for historic properties, and we recommend that the site boundaries in the GRIC CRMP report should not be revised to include outlying IOs.

Eligibility Recommendations

Nineteen archaeological sites and two historic canals were identified in GRIC CRMP's Class III report (Darling 2005). The eligibility of the historic canals—AZ T:10:83 (ASM) (Roosevelt Canal) and AZ T:12:154 (ASM) (Western Canal)—are currently being reassessed and will be addressed in an eligibility assessment report being prepared by HDR Engineering's Cultural Resources Section which will be submitted to your office at a later date. Of the archaeological sites, 18 are recommended as eligible to the NRHP and one is recommended as not eligible:

- AZ T:12:9 (ASM) (Villa Buena) and AZ T:12:52 (ASM) are prehistoric Hohokam villages with existing and/or historically documented public architecture. The sites are recommended as eligible for the NRHP under Criterion D for their potential to provide important information on prehistoric Hohokam social organization, settlement, and land use in the lower Salt River Valley, including the village structure and the development of irrigation communities south of the Salt River.
- AZ T:11:164 (ASM), AZ T:12:91 (ASM), AZ T:12:127 (ASM) (Baseline Ruin), AZ T:12:202 (ASM), AZ T:12:203 (ASM), AZ T:12:204 (ASM), AZ T:12:205 (ASM), and AZ T:12:206 (ASM) are prehistoric Hohokam artifact scatters. The sites are recommended as eligible for the NRHP under Criterion D for their potential to provide important information on prehistoric Hohokam social organization, settlement, and land use in the lower Salt River Valley, including the development and structure of irrigation communities.
- AZ T:12:197 (ASM), AZ T:12:201 (ASM), and AZ T:12:211 (ASM) are trail sites with associated features (age and cultural affiliation unknown, but likely Native American in origin). AZ T:12:207 (ASM) is a prehistoric trail site with an associated Hohokam artifact scatter. The sites are recommended as eligible for the NRHP under Criterion D for their potential to provide important information on prehistoric settlement and land use near the confluence of the Gila and Salt Rivers, including social mobility and transportation networks.
- AZ T:12:210 (ASM) is a prehistoric quarry (age and cultural affiliation unknown, but likely Native American in origin). The site is recommended as eligible for the NRHP under Criterion D for its potential to provide important information prehistoric settlement and land use near the confluence of the Gila and Salt Rivers, including lithic resource procurement and ground stone technology.



2001 Award Recipient

Jacobs
TRACS No. 202L MA 054 H5765 01L
January 12, 2006
Page 3 of 3

- AZ T:12:199 (ASM) and AZ T:12:200 (ASM) are historic O'odham artifact scatters. AZ T:12:199 (ASM) is recommended as eligible for the NRHP under Criterion D for its potential to provide important information on historical-period O'odham settlement and land use near the confluence of the Gila and Salt Rivers, including the use of upland areas for subsistence and religious practices. AZ T:12:200 (ASM) is recommended as not eligible for the NRHP due to a lack of integrity and information potential.
- AZ T:12:198 (ASM) and AZ T:12:208 (ASM) are prehistoric petroglyph sites with historic components. The sites are considered eligible to the NRHP under Criterion D for their potential to provide important information of prehistoric Hohokam and historic O'odham settlement and land use at the confluence of the Gila and Salt Rivers, including the use of upland areas for religious practices.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. If you agree that (1) the IOs do not qualify as sites and that the boundaries of the existing sites, as defined by the GRIC CRMP (Darling 2005), should not be revised to include outlying IOs, (2) that the proper treatment of affected cultural resources in the APE should include considerations of non-site cultural resources, and (3) if you agree with the National Register eligibility recommendations for the 19 archaeological sites, please indicate your concurrence by signing below. We also look forward to continuing consultation with your office. If you have any questions or concerns, please feel free to contact me at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely,



Ruth L. Greenspan
Historic Preservation Specialist
Environmental & Enhancement Group
205 South 17th Avenue Rm. 213E Mail Drop 619E
Phoenix, Arizona 85007-3213

Signature for SHPO Concurrence

Date

cc: SThomas (FHWA); WVachon (FHWA)



"Managing and conserving natural, cultural, and recreational resources"

January 23, 2006

Dr. Ruth Greenspan
Historic Preservation Specialist
Environmental and Enhancement Group
Arizona Department of Transportation
206 South 17th Avenue
Phoenix, AZ 85007-3212

RE: Project No. NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Class III Survey Report; Eligibility Recommendations
SHPO-2003-1890 (26970)

Dear Dr. Greenspan:

Thank you for consulting with this office regarding the cultural resources survey report and the eligibility recommendations associated with the South Mountain Transportation Corridor pursuant to Section 106 of the National Historic Preservation Act as implemented by 36 CFR Part 800. We have reviewed the submitted letter and eligibility recommendations, and offer the following comments.

The earlier submitted cultural resource report [*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*] by J. Andrew Darling identified 21 sites and 191 Isolated Occurrences (IOs). The current submitted letter [dated January 12, 2006] notes that the eligibility of the two historic canals [AZ T:10:83 (ASM), the Roosevelt Canal, and AZ T:12:154 (ASM), the Western Canal] are being reassessed, and will be addressed later. Of the remaining 19 sites, one [i.e., AZ T:12:200 (ASM)] is recommended as ineligible, and the 18 others [AZ T:11:164 (ASM) and AZ T:12:9, 52, 91, 127, 197, 198, 199, 201, 202, 203, 204, 205, 206, 207, 208, 210, and 211 (ASM)] are eligible to the National Register of Historic Places [NRHP] under Criterion D. We agree with these eligibility recommendations from a site-by-site consideration, however, consideration needs to be given to a broader context to properly understand the significance of the project area and the surrounding setting.

Our office noted in an earlier letter [dated July 11, 2005] that many of the IOs should be reconsidered as parts of larger entities, such as known prehistoric habitation sites, canals, and avenues of travel. Your letter acknowledges that "ADOT and FHWA recognize that while the IOs are not individually considered eligible to the NRHP, they are an important component to understanding the region's overall cultural pattern of prehistoric and historic use" and that "further investigation of them could be considered in any treatment plans that might be developed in the future." Our office agrees conceptually with this, but we are uncomfortable with your usage of the term "non-site" areas.

Janet Napolitano
Governor

State Parks
Board Members

Chair
Elizabeth Stewart
Tempe

William C. Porter
Kingman

William Cordasco
Flagstaff

Janice Chilton
Payson

William C. Scalzo
Phoenix

John U. Hays
Yamell

Mark Winkleman
State Land
Commissioner

Kenneth E. Travous
Executive Director

Arizona State Parks
1300 W. Washington
Phoenix, AZ 85007

Tel & TTY: 602.542.4174
www.azstateparks.com

800.285.3703 from
(520 & 928) area codes

General Fax:
602.542.4180

Director's Office Fax:
602.542.4188

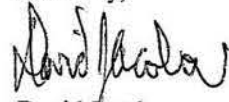
January 23, 2006
Page 2, Greenspan

Regarding the term "non-site" areas, the National Historic Preservation Act [NHPA] distinguishes five different property types [i.e., building, structure, site, district, and object] in contrast to the systematics to be found with the assignment of numbers by the Arizona State Museum [ASM]. In order for this project to meet federal standards, the National Register classification system should be used. In some cases, IOs may be considered to be contributing elements to structures (trails would be structures), districts, and landscapes. IOs may also be considered as objects, defined as constructions that are primarily artistic in nature or are relatively small in scale and simply constructed; although it may be, by nature or design, movable, an object is associated with a specific setting or environment. Examples of objects would include a boundary marker or milepost marker.

Regarding the project area, it is clear that a broader context [beyond the individual "site" and beyond the physical footprint of the project] needs to be considered to determine the significance of the many identified IOs, perhaps individually undistinguished, and even the purportedly ineligible and individually considered AZ T:12:200 (ASM), a historic O'odham artifact scatter. The property type of "district" and/or the notion of a cultural landscape should be seriously considered when addressing the significance of the "non-site" cultural resources within the South Mountain Transportation Corridor project area and the development of a treatment plan. Tribal input is crucial; the oral traditions of the O'odham identify the South Mountain area [Greasy Mountain?] as a place associated with Elder Brother [I'ittoi].

We do appreciate your cooperation with this office in considering the impacts of federal undertakings on cultural resources situated in Arizona, and we look forward to reviewing the revised data recovery report. If you have any questions, please contact me at (602) 542-7140 or electronically via djacobs@pr.state.az.us.

Sincerely,



David Jacobs
Compliance Specialist/Archaeologist
State Historic Preservation Office

CC: Barnaby Lewis, Gila River Indian Community



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-2264

March 7, 2006

In Reply Refer To: HRW-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H576401L
South Mountain Transportation Corridor
Section 106 Consultation

Mr. Steve Dibble
Archaeologist
United States Army Corp of Engineers
P.O. Box 532711
Los Angeles, California 90053-2325

Dear Mr. Dibble:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway EIS & Location/Design Concept Report project. The EIS addresses nine variations of five alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 in west Phoenix (see attached map).

As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review. Furthermore, because the South Mountain Freeway would cross jurisdictional waters of the US, there will be United States Army Corps of Engineers (Corps) involvement. Section 106 consultations were initiated for the project in August 2003. At that time, the Corps was inadvertently excluded from the list of participating agencies. It is therefore the purpose of this letter is to provide a summary of the consultations to date along with accompanying reports; to provide the Corps an opportunity to review and comment on the draft Programmatic Agreement (PA) developed for the project; and to inquire as to whether the Corps would prefer to participate in the PA as a Signatory or as a Concurring Party.

Land jurisdiction for the alternative alignments includes private land (5,160.7 acres) and lands administered by the Arizona State Land Department (101.4 acres), the Bureau of Land Management (35.1 acres), and the City of Phoenix Parks and Recreation Department (62.32 acres).

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the



Bureau of Reclamation (Reclamation), the Corps, the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County, the Maricopa County Department of Transportation, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community, the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe. The Advisory Council on Historic Preservation has declined to participate in the PA at this time.

The Area of Potential Effect (APE) is comprised of five alternative (overlapping) freeway corridors that extend from I-10 west of Phoenix to I-10 in west Chandler, south of the greater Phoenix metropolitan area. Alternative corridors are generally 1000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.

To date, there have been four cultural resources technical reports prepared for the EIS, which include two Class I overviews and two Class III survey reports:

In 2001, the first phase of the technical studies began with the Gila River Indian Community's Cultural Resource Management Program (GRIC-CRMP) preparing the initial Class I overview of the overall study area. The report is titled "A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona" (Burden 2002). Previous consultation regarding adequacy of the report resulted in responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix, Historic Preservation Office (Stocklin, September 8, 2003); City of Phoenix, Pueblo Grande Museum (Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).

The second phase of the project entailed pedestrian surveys of the proposed alternative alignments. The GRIC-CRMP conducted the Class III survey between November 2003 and March 2004. The results of the survey are presented in a report titled "A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona" (Darling 2005). Previous consultation regarding adequacy of the report resulted in responses from SHPO (Jacobs, January 23, 2006); BLM (Stone, July 26, 2005); BIA (Cantley, August 11, 2005); Reclamation (Czaplicki, July 12, 2005); City of Phoenix, Pueblo Grande Museum (Bostwick, July 18, 2005); and SRP (Anduze, August 8, 2005).

In late 2004 and early 2005, the third phase of the cultural studies included an addendum Class I overview that covered expanded portions of the study area along I-10 and the State Route 101L freeway corridors on the west side of Phoenix. HDR Engineering, Inc. (HDR) prepared the addendum Class I overview. The results were provided in a technical report titled "An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona" (Brodbeck and Touchin 2005). Previous consultation regarding adequacy of the report resulted in responses from SHPO (Jacobs, October 3, 2005), Reclamation (Czaplicki,

September 19, 2005); SRP (Anduze, September 19, 2005); City of Phoenix, Pueblo Grande Museum (Bostwick, November 1, 2005).

Finally, the fourth phase of the cultural resources studies entailed an addendum Class III survey. HDR conducted the survey in early 2005. The survey covered shifted proposed alignments, freshly plowed agricultural fields, and areas with historical resources that had been overlooked during the initial Class III survey (Darling 2005). The results are presented in a report titled "An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona" (Brodbeck 2005). Previous consultation regarding adequacy of the report resulted in responses from SHPO (Jacobs, October 3, 2005), Reclamation (Czaplicki, September 19, 2005); SRP (Anduze, September 19, 2005); and City of Phoenix, Pueblo Grande Museum (Bostwick, November 1, 2005).

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed cultural resources technical reports and the draft Programmatic Agreement (PA). If you concur with the adequacy of the reports and their eligibility recommendations, please indicate your concurrence by signing below as indicated. If you agree with the adequacy of the draft PA, please indicate your concurrence by signing below as indicated. In addition, please indicate below whether the Corps would like to participate as a Signatory or Concurring Party to the PA. We look forward to continuing consultation with your office to address project effects as the environmental documentation continues.

If you have any questions concerning this submission, please call Ruth Greenspan at 602-712-6266 or e-mail RGreenspan@azdot.gov.

Sincerely,

STEPHEN D. THOMAS

Robert E. Hollis
Division Administrator

Signature for Corps concurrence with adequacy
of the reports and eligibility recommendations

Date

Signature for Corps Concurrence with adequacy
of the draft PA

Date

The Corps prefers to participate in the PA as a Signatory or Consulting Party. (please circle)

Enclosures (draft PA and four technical reports)

cc:

SThomas

WVachon,

REllis (ADOT 619E)

RGreenSpan (ADOT 619E)

Cindy Lester – AZ Area Office, 3636 N Central Ave, Suite 900, Phoenix AZ 85012 (with enclosures)

SDThomas:cdm

NOTATION: 1. THE FOLLOWING INFORMATION IS FOR INFORMATIONAL PURPOSES ONLY. IT IS NOT TO BE USED FOR ANY OTHER PURPOSE. 2. THE FOLLOWING INFORMATION IS FOR INFORMATIONAL PURPOSES ONLY. IT IS NOT TO BE USED FOR ANY OTHER PURPOSE.



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 26, 2006

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Addendum Class III Survey Report

Mr. Steve Ross, Archaeologist
Arizona State Land Department
1616 West Adams Street
Phoenix, Arizona, 85007

Dear Mr. Ross:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations on three alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 west of Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the U.S. Army Corps of Engineers (COE), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County (FCDMC), the Maricopa County Department of Transportation (MCDOT), the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 in west Chandler to I-10 west of Phoenix, south of the greater Phoenix metropolitan area. Alternative corridors are 1,000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.



The cultural resources component of the EIS includes five technical studies:

Previous Consultation:

- A Class I overview of the overall study area: “*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*” (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: “*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*” (Darling 2005). Consultation regarding adequacy of the report is on-going. To date, concurring responses have been received from SHPO (Jacobs, July 11, 2005), Reclamation (Ellis, July 12, 2005), BLM (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quetawki, July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report was titled “*An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck and Touchin 2005). The Class III report was titled “*An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck 2005). To date, concurring responses have been received from SHPO (Jacobs, October 3, 2005), Reclamation (Ellis, September 19, 2005), City of Phoenix (Bostwick, November 1, 2005), and SRP (Anduze, September 19, 2005).

Current Consultation:

A second addendum cultural resources assessment report has been prepared by HDR, Inc. in order to address the National Register of Historic Places (NRHP) eligibility of four properties and clarifies the location of a fifth property relative to the APE. In September 2005, the W55 and W71 were shifted north of the Salt River to avoid potential impact to historic properties. As a result of this shift, two historic residential properties were added to the APE: 6304 West Dobbins Road and 7316 West Lower Buckeye Road. Furthermore, two properties in the existing APE required additional evaluation: South Mountain Park/Preserve and specific segments of the Roosevelt Canal (AZ T:10:83 [ASM]) in the alternative alignments. Finally, the location of the Western Canal (AZ T:12:154 [ASM]) relative to the APE is addressed. The report, “*A Second Addendum Cultural Resources Report for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck 2006), assesses the NRHP eligibility of South Mountain Park/Preserve and the Roosevelt Canal

(Brodbeck 2006). As subconsultants to HDR, architectural historians with EcoPlan Associates (EcoPlan) assessed the two residential properties (Brodbeck 2006, Appendix A). The report is enclosed for your review and comment.

South Mountain Park/Preserve is a municipal park owned by the City of Phoenix and managed by their Parks and Recreation Department. Approximately 32 acres of the 16,000+ acre-park is in the proposed E1 Alignment. FHWA and ADOT recommend that the South Mountain Park/Preserve is eligible for inclusion in the NRHP under Criterion A for its associations with the National Park Service (NPS) and Civilian Conservation Corps (CCC) New Deal programs in Phoenix during the Depression era. The park is also recommended as eligible under Criterion C for its overall sensitive design that set historical precedent in planning natural parks and implementing NPS design standards for improvements in wilderness area parks. While the current study focused on the 32 acres within the footprint of the E1 Alternative, further evaluation of the park’s entire 16,000+ acres has the potential to establish eligibility under Criterion B for associations with influential NPS architects; under Criterion C for the architectural merit of its buildings and structures, both individually and collectively as a district; and under Criterion D for its collection of prehistoric archaeological sites and historical mining-related sites (components of the park’s mining sites may also be eligible under Criterion A pending further study).

In its entirety, the Roosevelt Canal—AZ T:10:83 (ASM)—is considered eligible for the NRHP under Criterion A for its associations with the historical development of irrigation districts in lower Salt River Valley. While previous studies for the South Mountain EIS Study acknowledged that the Roosevelt Canal was NRHP eligible (Burden 2002; Darling 2005), the specific segments within the proposed alternative alignments had not been assessed in terms of whether they are contributing or non-contributing to that eligibility. The Roosevelt Canal intersects the proposed alternative alignment footprints in four locations. The canal segments that cross the W55 and W71 Alternatives south of Van Buren Road retain integrity and are recommended as eligible to the National Register under Criterion A as contributing components. The segments that cross the proposed alternative alignments in the I-10 and the 101L freeway corridors are modern realignments that lack historical integrity, and therefore are recommended to be non-contributing components.

The rural residences at 6304 West Dobbins Road and 7316 West Lower Buckeye Road were added to the project’s APE as a result of alignment shifts referred to above. Both properties are on privately-owned land. Architectural historians with EcoPlan evaluated the properties’ eligibility (Brodbeck 2006, Appendix A). Both properties lack important historical associations and architectural merit, therefore, FHWA and ADOT recommend that neither property is eligible for inclusion in the NRHP.

Finally, the initial Class III survey report for the South Mountain Freeway study (Darling 2005) had identified the Western Canal (AZ T:12:154 [ASM]) as an historic property in the APE, in the E1 Alternative at Elliot Road. The Western Canal is owned and managed by Reclamation and SRP. Further study has indicated that this irrigation feature is actually a tail-water drainage ditch and that the Western Canal terminates prior to reaching the APE. FHWA and ADOT recommend that the Western Canal will not be affected by the proposed undertaking.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed cultural resource assessment report and information provided in this letter. If you find the report adequate and agree with the eligibility recommendations, please indicate your concurrence by signing

below. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely yours,

STEPHEN D. THOMAS

Robert E. Hollis
Division Administrator

Signature for ASLD Concurrence

Date

Enclosure
cc:
SThomas
RGreenspan (MD 619E)
SDThomas:cdm

- The previous letter was also sent to:
- Mr. Garry Cantley, Western Regional
Archaeologist, Bureau of Indian Affairs

Ms. Cheryl Blanchard, Archaeologist,
Bureau of Land Management

Mr. Bryan Lausten, Archaeologist, Bureau of
Reclamation

Mr. Charlie McClendon, City Manager,
City of Avondale

Mr. Mike Normand, Transportation Services
& Planning Manager, City of Chandler

Mr. Ron Short, Deputy Director for Long
Range Planning, City of Glendale

Dr. Todd Bostwick, Archaeologist, City of
Phoenix

Ms. Barbara Stocklin, Historic Preservation
Officer, City of Phoenix

Mr. Ralph Valez, City Manager, City of
Tolleson

Mr. Larry Hendershot, Flood Control
District of Maricopa County

Mr. Brian Kenny, Environment Programs
Manager, Maricopa County Department
of Transportation

Mr. Stanley Ashby, Superintendent,
Roosevelt Irrigation District

Mr. Rick Anduze, Archaeologist, Salt River
Project

Dr. David Jacobs, Compliance Specialist,
State Historic Preservation Office

Mr. Steve Dibble, Archaeologist, United
States Army Corps of Engineers

Ms. Delia M. Carlyle, Chairwoman, Ak-
Chin Indian Community

Mr. Charles Wood, Chairman, Chemehuevi
Indian Tribe

Ms. Sherry Cordova, Chairwoman, Cocopah
Indian Tribe

Mr. Daniel Eddy, Jr., Chairman, Colorado
River Indian Tribes

Mr. Ralph Bear, President, Fort McDowell
Yavapai Nation

Ms. Nora McDowell, Chairman, Fort
Mojave Indian Tribe

Mr. Mike Jackson, Sr., President, Fort
Yuma-Quechan Tribe

Mr. William Rhodes, Governor, Gila River
Indian Community

Mr. Thomas Siyuja, Chairman, Havasupai
Tribe

Mr. Leigh Kuwanisiwma, Hopi Tribe

Mr. Gary Tom, Chairman, Kaibab-Band of
Paiute Indian Tribes

Dr. Allen Downer, Tribal Historic
Preservation Officer, Navajo Nation
Historic Preservation Department

Ms. Herminia Frias, Chairwoman, Pascua
Yaqui Tribe

Mr. Arden Quewakia, Governor, Pueblo of
Zuni

Ms. Joni Ramos, President, Salt River Pima-
Maricopa Indian Community

Ms. Kathleen Wesley-Kitcheyan,
Chairwoman, San Carlos Apache Nation

Ms. Evelyn James, President, San Juan
Southern Paiute

Mr. Peter Steere, Tribal Historic Preservation
Officer, Tohono O'odham Nation

Mr. Joe Joaquin, Cultural Resource
Specialist, Tohono O'odham Nation

Mr. Ivan Smith, Chairman, Tonto Apache
Tribe

Mr. Dallas Massey, Sr., Chairman, White
Mountain Apache Tribe

Mr. Jamie Fullmer, Chairman, Yavapai-
Apache Nation

Mr. Ernest Jones, Sr., President, Yavapai-
Prescott Indian Tribe



**Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674**

June 28, 2006

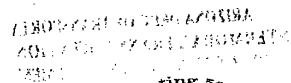
In Reply Refer To: HA-AZ
NH-202-D (ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Section 106 Consultation
Traditional Cultural Places
Eligibility Evaluation Report

Mr. William Rhodes, Governor
Gila River Indian Community
P.O. Box 97
Sacaton, Arizona 85247

Dear Governor Rhodes:

As you are aware, the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses nine variations of five alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from the I-10/ 202L traffic interchange to I-10 in west Phoenix. This project is a federal action that requires compliance with Section 106 of the National Historic Preservation Act. The area of potential effect (APE) is comprised of the alternative alignment corridors.

The proposed alternative alignments being studied for the EIS have potential to affect archaeological sites and natural features on the landscape that may be deemed sacred by Native American tribes and that may qualify for the National Register of Historic Places as traditional cultural properties. The Gila River Indian Community's Cultural Resource Management Program (CRMP) conducted the initial survey of the alternative alignments. The results were presented in a report titled *A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona* (Darling 2005). In the report, the CRMP identified ten properties as places of cultural importance that could potentially be eligible for the National Register of Historic Places as traditional cultural properties: the South Mountain Range (commonly referred to as "South Mountain"); two prehistoric villages, AZ T:12:9 (ASM) (Villa Buena) and AZ T:12:52 (ASM) (Pueblo del Alamo); two rock art sites, AZ T:12:198 (ASM) and AZ T:12:208 [ASM]), four trail sites, AZ T:12:197 (ASM), AZ T:12:201 (ASM), AZ T:12:207 (ASM), and AZ T:12:211 [ASM]); and one shrine site, AZ T:12:112 (ASM) (Darling 2005). While the CRMP did not formally evaluate these sites as traditional cultural properties in their study, they recommended continued consultations to address the issue and the concerns of the community.



In response, FWH and ADOT requested additional information regarding any concerns regarding historic properties of religious or cultural importance to the community, in a letter dated July 7, 2005. FHW and ADOT appreciate the letter sent in response by former Governor Richard P. Nardcia, dated September 30, 2005, which reconfirmed the cultural importance of three of the properties: South Mountain, Villa Buena, and Pueblo del Alamo.

In accordance with the National Historic Preservation Act (36 CFR 800.4), which requires federal agencies to make a reasonable and good faith effort to identify historic properties that could be affected by a project, FHWA and ADOT have prepared the enclosed traditional cultural property assessment report, which evaluates the eligibility of the above mentioned properties for the National Register of Historic Places. The report is titled *An Evaluation of Traditional Cultural Properties for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2006).

Please review the enclosed traditional cultural property evaluation report, and the information provided in this letter. If you agree with the adequacy of the report and eligibility recommendations, please sign below to indicate your concurrence. We look forward to continuing consultation with your office. If you have any question or concerns, please do not hesitate to call Ruth Greenspan at 602-712-6266 or email R.Greenspan@azdot.gov.

Sincerely,

STEPHEN D. THOMAS

Robert E. Hollis
Division Administrator

Signature for Tribal Concurrence

Date _____

Enclosure

cc:

SThomas

RGreenspan (619E)

J. Andrew Darling, Coordinator, Cultural Resource Management Program, GRIC, P.O. Box 2140,
Sacaton, AZ 85247 (with enclosure)

Barnaby V. Lewis, Cultural Resource Specialist, GRIC, P.O. Box E, Sacaton, AZ 85247 (with enclosure)

SDThomas:cdm

This letter was also sent to Dr. David Jacobs, Compliance Specialist, State Historic Preservation Office



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 28, 2006

In Reply Refer To: HA-AZ
NH-202-D (ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Section 106 Consultation
Traditional Cultural Places
Eligibility Evaluation Report

Dr. David Jacobs, Compliance Specialist
State Historic Preservation Office
Arizona State Parks
1300 West Washington
Phoenix, Arizona 85007

Dear Dr. Jacobs:

As you are aware, the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses nine variations of five alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from the I-10/ 202L traffic interchange to I-10 is west Phoenix. This project is a federal action that requires compliance with Section 106 of the National Historic Preservation Act. The area of potential effect (APE) is comprised of the alternative alignment corridors.

The proposed alternative alignments being studied for the EIS have potential to affect archaeological sites and natural features on the landscape that may be deemed sacred by Native American tribes and that may qualify for the National Register of Historic Places as traditional cultural properties. The Gila River Indian Community's Cultural Resource Management Program (CRMP) conducted the initial survey of the alternative alignments. The results were presented in a report titled *A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona* (Darling 2005). In the report, the CRMP identified ten properties as places of cultural importance that could potentially be eligible for the National Register of Historic Places as traditional cultural properties: the South Mountain Range (commonly referred to as "South Mountain"); two prehistoric villages, AZ T:12:9 (ASM) (Villa Buena) and AZ T:12:52 (ASM) (Pueblo del Alamo); two rock art sites, AZ T:12:198 (ASM) and AZ T:12:208 [ASM]), four trail sites, AZ T:12:197 (ASM), AZ T:12:201 (ASM), AZ T:12:207 (ASM), and AZ T:12:211 [ASM]); and one shrine site, AZ T:12:112 (ASM) (Darling 2005). While the CRMP did not formally evaluate these sites as traditional cultural properties in their study, they recommended continued consultations to address the issue and the concerns of the community.



2
In response, FHWA and ADOT requested additional information regarding any concerns regarding historic properties of religious or cultural importance to the community, in a letter dated July 7, 2005. FHWA and ADOT appreciate the letter sent in response by former Governor Richard P. Nacira, dated September 30, 2005, which reconfirmed the cultural importance of three of the properties: South Mountain, Villa Buena, and Pueblo del Alamo.

In accordance with the National Historic Preservation Act (36 CFR 800.4), which requires federal agencies to make a reasonable and good faith effort to identify historic properties that could be affected by a project, FHWA and ADOT have prepared the enclosed traditional cultural property assessment report which evaluates the eligibility of the above mentioned properties for the National Register of Historic Places. The report is titled *An Evaluation of Traditional Cultural Properties for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2006).

Please review the enclosed traditional cultural property evaluation report, and the information provided in this letter. If you agree with the adequacy of the report and eligibility recommendations, please sign below to indicate your concurrence. We look forward to continuing consultation with your office. If you have any question or concerns, please do not hesitate to call Ruth Greenspan at 602-712-6266 or email RGreenspan@azdot.gov.

Sincerely,

STEPHEN D. THOMAS

Robert E. Hollis
Division Administrator

Signature for Tribal Concurrence _____ Date _____

Enclosure
cc:
J. Andrew Darling, Coordinator, Cultural Resource Management Program, GRIC, P.O. Box 2140, Sacaton, AZ 85247
Barnaby V. Lewis, Cultural Resource Specialist, GRIC, P.O. Box E, Sacaton, AZ 85247
SThomas
RGreenspan (619E)
SDThomas:cdm



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 26, 2006

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Addendum Class III Survey Report

Mr. Mike Normand
Transportation Services & Planning Manager
City of Chandler
P.O. Box 4008, Mailstop 412
Chandler, Arizona, 85244-4008

Dear Mr. Normand:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations on three alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 west of Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the U.S. Army Corps of Engineers (COE), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County (FCDMC), the Maricopa County Department of Transportation (MCDOT), the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 in west Chandler to I-10 west of Phoenix, south of the greater



Phoenix metropolitan area. Alternative corridors are 1,000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.

The cultural resources component of the EIS includes five technical studies:

Previous Consultation:

- A Class I overview of the overall study area: "*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*" (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: "*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*" (Darling 2005). Consultation regarding adequacy of the report is on-going. To date, concurring responses have been received from SHPO (Jacobs, July 11, 2005), Reclamation (Ellis, July 12, 2005), BLM (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quetawki, July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report was titled "*An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*" (Brodbeck and Touchin 2005). The Class III report was titled "*An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*" (Brodbeck 2005). To date, concurring responses have been received from SHPO (Jacobs, October 3, 2005), Reclamation (Ellis, September 19, 2005), City of Phoenix (Bostwick, November 1, 2005), and SRP (Anduze, September 19, 2005).

Current Consultation:

A second addendum cultural resources assessment report has been prepared by HDR, Inc. in order to address the National Register of Historic Places (NRHP) eligibility of four properties and clarifies the location of a fifth property relative to the APE. In September 2005, the W55 and W71 were shifted north of the Salt River to avoid potential impact to historic properties. As a result of this shift, two historic residential properties were added to the APE: 6304 West Dobbins Road and 7316 West Lower Buckeye Road. Furthermore, two properties in the existing APE required additional evaluation: South Mountain Park/Preserve and specific segments of the Roosevelt Canal (AZ T:10:83 [ASM]) in the alternative alignments. Finally, the location of the Western Canal (AZ T:12:154 [ASM]) relative to the APE is addressed. The report, "*A Second Addendum Cultural Resources Report for the 202L, South*

3
Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona (Brodbeck 2006), assesses the NRHP eligibility of South Mountain Park/Preserve and the Roosevelt Canal (Brodbeck 2006). As subconsultants to HDR, architectural historians with EcoPlan Associates (EcoPlan) assessed the two residential properties (Brodbeck 2006, Appendix A). The report is enclosed for your review and comment.

South Mountain Park/Preserve is a municipal park owned by the City of Phoenix and managed by their Parks and Recreation Department. Approximately 32 acres of the 16,000+ acre-park is in the proposed E1 Alignment. FHWA and ADOT recommend that the South Mountain Park/Preserve is eligible for inclusion in the NRHP under Criterion A for its associations with the National Park Service (NPS) and Civilian Conservation Corps (CCC) New Deal programs in Phoenix during the Depression era. The park is also recommended as eligible under Criterion C for its overall sensitive design that set historical precedent in planning natural parks and implementing NPS design standards for improvements in wilderness area parks. While the current study focused on the 32 acres within the footprint of the E1 Alternative, further evaluation of the park's entire 16,000+ acres has the potential to establish eligibility under Criterion B for associations with influential NPS architects; under Criterion C for the architectural merit of its buildings and structures, both individually and collectively as a district; and under Criterion D for its collection of prehistoric archaeological sites and historical mining-related sites (components of the park's mining sites may also be eligible under Criterion A pending further study).

In its entirety, the Roosevelt Canal—AZ T:10:83 (ASM)—is considered eligible for the NRHP under Criterion A for its associations with the historical development of irrigation districts in lower Salt River Valley. While previous studies for the South Mountain EIS Study acknowledged that the Roosevelt Canal was NRHP eligible (Burden 2002; Darling 2005), the specific segments within the proposed alternative alignments had not been assessed in terms of whether they are contributing or non-contributing to that eligibility. The Roosevelt Canal intersects the proposed alternative alignment footprints in four locations. The canal segments that cross the W55 and W71 Alternatives south of Van Buren Road retain integrity and are recommended as eligible to the National Register under Criterion A as contributing components. The segments that cross the proposed alternative alignments in the I-10 and the 101L freeway corridors are modern realignments that lack historical integrity, and therefore are recommended to be non-contributing components.


The rural residences at 6304 West Dobbins Road and 7316 West Lower Buckeye Road were added to the project's APE as a result of alignment shifts referred to above. Both properties are on privately-owned land. Architectural historians with EcoPlan evaluated the properties' eligibility (Brodbeck 2006, Appendix A). Both properties lack important historical associations and architectural merit, therefore, FHWA and ADOT recommend that neither property is eligible for inclusion in the NRHP.


Finally, the initial Class III survey report for the South Mountain Freeway study (Darling 2005) had identified the Western Canal (AZ T:12:154 [ASM]) as an historic property in the APE, in the E1 Alternative at Elliot Road. The Western Canal is owned and managed by Reclamation and SRP. Further study has indicated that this irrigation feature is actually a tail-water drainage ditch and that the Western Canal terminates prior to reaching the APE. FHWA and ADOT recommend that the Western Canal will not be affected by the proposed undertaking.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed

4
cultural resource assessment report and information provided in this letter. If you find the report adequate and agree with the eligibility recommendations, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely yours,


Robert E. Hollis
Division Administrator


Signature for Chandler Concurrence

7/3/06
Date

Enclosure



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 26, 2006

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Addendum Class III Survey Report

Mr. Brian Kenny
Environment Programs Manager
Maricopa County Department of Transportation
2901 West Durango Street
Phoenix, Arizona, 85009

Dear Mr. Kenny:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations on three alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 west of Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the U.S. Army Corps of Engineers (COE), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County (FCDMC), the Maricopa County Department of Transportation (MCDOT), the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 in west Chandler to I-10 west of Phoenix, south of the greater



Phoenix metropolitan area. Alternative corridors are 1,000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.

The cultural resources component of the EIS includes five technical studies:

Previous Consultation:

- A Class I overview of the overall study area: "*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*" (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: "*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*" (Darling 2005). Consultation regarding adequacy of the report is on-going. To date, concurring responses have been received from SHPO (Jacobs, July 11, 2005), Reclamation (Ellis, July 12, 2005), BLM (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quetawki, July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report was titled "*An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*" (Brodbeck and Touchin 2005). The Class III report was titled "*An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*" (Brodbeck 2005). To date, concurring responses have been received from SHPO (Jacobs, October 3, 2005), Reclamation (Ellis, September 19, 2005), City of Phoenix (Bostwick, November 1, 2005), and SRP (Anduze, September 19, 2005).

Current Consultation:

A second addendum cultural resources assessment report has been prepared by HDR, Inc. in order to address the National Register of Historic Places (NRHP) eligibility of four properties and clarifies the location of a fifth property relative to the APE. In September 2005, the W55 and W71 were shifted north of the Salt River to avoid potential impact to historic properties. As a result of this shift, two historic residential properties were added to the APE: 6304 West Dobbins Road and 7316 West Lower Buckeye Road. Furthermore, two properties in the existing APE required additional evaluation: South Mountain Park/Preserve and specific segments of the Roosevelt Canal (AZ T:10:83 [ASM]) in the alternative alignments. Finally, the location of the Western Canal (AZ T:12:154 [ASM]) relative to the APE is addressed. The report, "*A Second Addendum Cultural Resources Report for the 202L, South*

Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona” (Brodbeck 2006), assesses the NRHP eligibility of South Mountain Park/Preserve and the Roosevelt Canal (Brodbeck 2006). As subconsultants to HDR, architectural historians with EcoPlan Associates (EcoPlan) assessed the two residential properties (Brodbeck 2006, Appendix A). The report is enclosed for your review and comment.

South Mountain Park/Preserve is a municipal park owned by the City of Phoenix and managed by their Parks and Recreation Department. Approximately 32 acres of the 16,000+ acre-park is in the proposed E1 Alignment. FHWA and ADOT recommend that the South Mountain Park/Preserve is eligible for inclusion in the NRHP under Criterion A for its associations with the National Park Service (NPS) and Civilian Conservation Corps (CCC) New Deal programs in Phoenix during the Depression era. The park is also recommended as eligible under Criterion C for its overall sensitive design that set historical precedent in planning natural parks and implementing NPS design standards for improvements in wilderness area parks. While the current study focused on the 32 acres within the footprint of the E1 Alternative, further evaluation of the park’s entire 16,000+ acres has the potential to establish eligibility under Criterion B for associations with influential NPS architects; under Criterion C for the architectural merit of its buildings and structures, both individually and collectively as a district; and under Criterion D for its collection of prehistoric archaeological sites and historical mining-related sites (components of the park’s mining sites may also be eligible under Criterion A pending further study).

In its entirety, the Roosevelt Canal—AZ T:10:83 (ASM)—is considered eligible for the NRHP under Criterion A for its associations with the historical development of irrigation districts in lower Salt River Valley. While previous studies for the South Mountain EIS Study acknowledged that the Roosevelt Canal was NRHP eligible (Burden 2002; Darling 2005), the specific segments within the proposed alternative alignments had not been assessed in terms of whether they are contributing or non-contributing to that eligibility. The Roosevelt Canal intersects the proposed alternative alignment footprints in four locations. The canal segments that cross the W55 and W71 Alternatives south of Van Buren Road retain integrity and are recommended as eligible to the National Register under Criterion A as contributing components. The segments that cross the proposed alternative alignments in the I-10 and the 101L freeway corridors are modern realignments that lack historical integrity, and therefore are recommended to be non-contributing components.


The rural residences at 6304 West Dobbins Road and 7316 West Lower Buckeye Road were added to the project’s APE as a result of alignment shifts referred to above. Both properties are on privately-owned land. Architectural historians with EcoPlan evaluated the properties’ eligibility (Brodbeck 2006, Appendix A). Both properties lack important historical associations and architectural merit, therefore, FHWA and ADOT recommend that neither property is eligible for inclusion in the NRHP.


Finally, the initial Class III survey report for the South Mountain Freeway study (Darling 2005) had identified the Western Canal (AZ T:12:154 [ASM]) as an historic property in the APE, in the E1 Alternative at Elliot Road. The Western Canal is owned and managed by Reclamation and SRP. Further study has indicated that this irrigation feature is actually a tail-water drainage ditch and that the Western Canal terminates prior to reaching the APE. FHWA and ADOT recommend that the Western Canal will not be affected by the proposed undertaking.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed

cultural resource assessment report and information provided in this letter. If you find the report adequate and agree with the eligibility recommendations, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely yours,


Robert E. Hollis
Division Administrator


Signature for MCDOT Concurrence
Brian W. Kenny

Date July 5, 2006

Enclosure



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 26, 2006

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Addendum Class III Survey Report

Dr. Todd Bostwick, Archaeologist
City of Phoenix
Pueblo Grande Museum
4619 East Washington Street
Phoenix, Arizona, 85034

Dear Dr. Bostwick:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations on three alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 west of Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the U.S. Army Corps of Engineers (COE), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County (FCDMC), the Maricopa County Department of Transportation (MCDOT), the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua-Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 in west Chandler to I-10 west of Phoenix, south of the greater



2

Phoenix metropolitan area. Alternative corridors are 1,000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.

The cultural resources component of the EIS includes five technical studies:

Previous Consultation:

- A Class I overview of the overall study area: "*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*" (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: "*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*" (Darling 2005). Consultation regarding adequacy of the report is on-going. To date, concurring responses have been received from SHPO (Jacobs, July 11, 2005), Reclamation (Ellis, July 12, 2005), BLM (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quetawki, July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report was titled "*An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*" (Brodbeck and Touchin 2005). The Class III report was titled "*An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*" (Brodbeck 2005). To date, concurring responses have been received from SHPO (Jacobs, October 3, 2005), Reclamation (Ellis, September 19, 2005), City of Phoenix (Bostwick, November 1, 2005), and SRP (Anduze, September 19, 2005).

Current Consultation:

A second addendum cultural resources assessment report has been prepared by HDR, Inc. in order to address the National Register of Historic Places (NRHP) eligibility of four properties and clarifies the location of a fifth property relative to the APE. In September 2005, the W55 and W71 were shifted north of the Salt River to avoid potential impact to historic properties. As a result of this shift, two historic residential properties were added to the APE: 6304 West Dobbins Road and 7316 West Lower Buckeye Road. Furthermore, two properties in the existing APE required additional evaluation: South Mountain Park/Preserve and specific segments of the Roosevelt Canal (AZ T:10:83 [ASM]) in the alternative alignments. Finally, the location of the Western Canal (AZ T:12:154 [ASM]) relative to the APE is addressed. The report, "*A Second Addendum Cultural Resources Report for the 202L, South*

Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona” (Brodbeck 2006), assesses the NRHP eligibility of South Mountain Park/Preserve and the Roosevelt Canal (Brodbeck 2006). As subconsultants to HDR, architectural historians with EcoPlan Associates (EcoPlan) assessed the two residential properties (Brodbeck 2006, Appendix A). The report is enclosed for your review and comment.

South Mountain Park/Preserve is a municipal park owned by the City of Phoenix and managed by their Parks and Recreation Department. Approximately 32 acres of the 16,000+ acre-park is in the proposed E1 Alignment. FHWA and ADOT recommend that the South Mountain Park/Preserve is eligible for inclusion in the NRHP under Criterion A for its associations with the National Park Service (NPS) and Civilian Conservation Corps (CCC) New Deal programs in Phoenix during the Depression era. The park is also recommended as eligible under Criterion C for its overall sensitive design that set historical precedent in planning natural parks and implementing NPS design standards for improvements in wilderness area parks. While the current study focused on the 32 acres within the footprint of the E1 Alternative, further evaluation of the park’s entire 16,000+ acres has the potential to establish eligibility under Criterion B for associations with influential NPS architects; under Criterion C for the architectural merit of its buildings and structures, both individually and collectively as a district; and under Criterion D for its collection of prehistoric archaeological sites and historical mining-related sites (components of the park’s mining sites may also be eligible under Criterion A pending further study).

In its entirety, the Roosevelt Canal—AZ T:10:83 (ASM)—is considered eligible for the NRHP under Criterion A for its associations with the historical development of irrigation districts in lower Salt River Valley. While previous studies for the South Mountain EIS Study acknowledged that the Roosevelt Canal was NRHP eligible (Burden 2002; Darling 2005), the specific segments within the proposed alternative alignments had not been assessed in terms of whether they are contributing or non-contributing to that eligibility. The Roosevelt Canal intersects the proposed alternative alignment footprints in four locations. The canal segments that cross the W55 and W71 Alternatives south of Van Buren Road retain integrity and are recommended as eligible to the National Register under Criterion A as contributing components. The segments that cross the proposed alternative alignments in the I-10 and the 101L freeway corridors are modern realignments that lack historical integrity, and therefore are recommended to be non-contributing components.

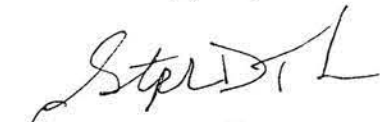
The rural residences at 6304 West Dobbins Road and 7316 West Lower Buckeye Road were added to the project’s APE as a result of alignment shifts referred to above. Both properties are on privately-owned land. Architectural historians with EcoPlan evaluated the properties’ eligibility (Brodbeck 2006, Appendix A). Both properties lack important historical associations and architectural merit, therefore, FHWA and ADOT recommend that neither property is eligible for inclusion in the NRHP.

Finally, the initial Class III survey report for the South Mountain Freeway study (Darling 2005) had identified the Western Canal (AZ T:12:154 [ASM]) as an historic property in the APE, in the E1 Alternative at Elliot Road. The Western Canal is owned and managed by Reclamation and SRP. Further study has indicated that this irrigation feature is actually a tail-water drainage ditch and that the Western Canal terminates prior to reaching the APE. FHWA and ADOT recommend that the Western Canal will not be affected by the proposed undertaking.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed

cultural resource assessment report and information provided in this letter. If you find the report adequate and agree with the eligibility recommendations, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely yours,


Robert E. Hollis
Division Administrator


Signature for Phoenix Concurrence

7-5-06
Date

Enclosure

Brodbeck, Mark

From: Ruth Greenspan [RGreenspan@azdot.gov]
Sent: Thursday, July 06, 2006 4:49 PM
To: Steve Thomas
Cc: Brodbeck, Mark
Subject: S. Mt. consultation - response from CRIT

Hi, Steve--

I just got a phone call from Michael Tsosie, who is the director of the Colorado River Indian Tribes Museum, in response to the consultation letter sent for the 2nd Addendum report. He informed me that CRIT would be unable to concur with the consultation, because South Mountain is a TCP for them, and plays an important role in their creation myth. I asked him to please make a written response to the consultation letter outlining their concerns, and assured him that the written response would trigger another round of consultation.

Ruth

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by e-mail, and delete or destroy all copies plus attachments.

S. Mt. consultation - response from CRIT

Page 1 of 1

7/6/06

Brodbeck, Mark

To: Allen, Jack; Edwards, Amy
Subject: FW: S. Mt. consultation - response from CRIT

FYI

From: Ruth Greenspan [mailto:RGreenspan@azdot.gov]
Sent: Thursday, July 06, 2006 4:49 PM
To: Steve Thomas
Cc: Brodbeck, Mark
Subject: S. Mt. consultation - response from CRIT

Hi, Steve--

I just got a phone call from Michael Tsosie, who is the director of the Colorado River Indian Tribes Museum, in response to the consultation letter sent for the 2nd Addendum report. He informed me that CRIT would be unable to concur with the consultation, because South Mountain is a TCP for them, and plays an important role in their creation myth. I asked him to please make a written response to the consultation letter outlining their concerns, and assured him that the written response would trigger another round of consultation.

Ruth

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by e-mail, and delete or destroy all copies plus attachments.

White Mountain Apache Tribe Historic Preservation Office
PO Box 507, Fort Apache, AZ 85941
1(928) 338-3033 / fax: 338-6055

To: Ruth L. Greenspan, ADOT Historic Preservation Specialist.
Date: July 07, 2006,
Project: South Mountain Transportation Corridor – HA-AZ NH-202-D(ADY)

The White Mountain Apache Tribal Historic Preservation Office (THPO) appreciates receiving information on the proposed project, dated June 26, 06. In regards to this, please attend to the checked items below.

- There is no need to send additional information – unless project planning or implementation results in the discovery of sites or items having known or suspected Apache cultural affiliations.
- ☐ The proposed Project is located within an area of probable cultural or historical importance to the White Mountain Apache Tribe (WMAT). As part of the effort to identify historical properties that maybe affected by the project we recommend an entnohistorical study and interviews with Apache elders. Ramon Riley, the Cultural Resource Director is the contact person at (928) 338-4625.
- ☐ The proposed project is located within or adjacent to a known historic property of cultural or historical importance to the WMAT and will most likely result in adverse affects to said property. Please refrain from further steps in project planning or implementation.

NOTES: We have finally received and reviewed the information in regards to the conducted technical studies in support of the Environmental Impact Statement for the 202L, South Mountain Freeway and we have determined that the project poses no threat to the White Mountain Apache Tribe's (WMAT) Traditional Cultural Properties and/or important religious places in the APE. Please feel free to address any further question(s) and/or concerns regarding the project with our office. We perceive no problems and the proposed projects may proceed as planned.

We look forward to continued collaboration in the protection and preservation of places of cultural and historical significance.

Sincerely,

Mark T. Altaha
Tribal Historic Preservation Officer
White Mountain Apache Tribe



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 26, 2006

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Addendum Class III Survey Report

Mr. Rick Anduze, Archaeologist
Salt River Project
P.O. Box 52025, Mailstop PAB 352
Phoenix, Arizona, 85072-2025

Dear Mr. Anduze:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations on three alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 west of Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the U.S. Army Corps of Engineers (COE), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County (FCDMC), the Maricopa County Department of Transportation (MCDOT), the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 in west Chandler to I-10 west of Phoenix, south of the greater Phoenix metropolitan area. Alternative corridors are 1,000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.



The cultural resources component of the EIS includes five technical studies:

Previous Consultation:

- A Class I overview of the overall study area: “*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*” (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: “*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*” (Darling 2005). Consultation regarding adequacy of the report is on-going. To date, concurring responses have been received from SHPO (Jacobs, July 11, 2005), Reclamation (Ellis, July 12, 2005), BLM (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quetawki), July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report was titled “*An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck and Touchin 2005). The Class III report was titled “*An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck 2005). To date, concurring responses have been received from SHPO (Jacobs, October 3, 2005), Reclamation (Ellis, September 19, 2005), City of Phoenix (Bostwick, November 1, 2005), and SRP (Anduze, September 19, 2005).

Current Consultation:

A second addendum cultural resources assessment report has been prepared by HDR, Inc. in order to address the National Register of Historic Places (NRHP) eligibility of four properties and clarifies the location of a fifth property relative to the APE. In September 2005, the W55 and W71 were shifted north of the Salt River to avoid potential impact to historic properties. As a result of this shift, two historic residential properties were added to the APE: 6304 West Dobbins Road and 7316 West Lower Buckeye Road. Furthermore, two properties in the existing APE required additional evaluation: South Mountain Park/Preserve and specific segments of the Roosevelt Canal (AZ T:10:83 [ASM]) in the alternative alignments. Finally, the location of the Western Canal (AZ T:12:154 [ASM]) relative to the APE is addressed. The report, “*A Second Addendum Cultural Resources Report for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck 2006), assesses the NRHP eligibility of South Mountain Park/Preserve and the Roosevelt Canal

(Brodbeck 2006). As subconsultants to HDR, architectural historians with EcoPlan Associates (EcoPlan) assessed the two residential properties (Brodbeck 2006, Appendix A). The report is enclosed for your review and comment.

South Mountain Park/Preserve is a municipal park owned by the City of Phoenix and managed by their Parks and Recreation Department. Approximately 32 acres of the 16,000+ acre-park is in the proposed E1 Alignment. FHWA and ADOT recommend that the South Mountain Park/Preserve is eligible for inclusion in the NRHP under Criterion A for its associations with the National Park Service (NPS) and Civilian Conservation Corps (CCC) New Deal programs in Phoenix during the Depression era. The park is also recommended as eligible under Criterion C for its overall sensitive design that set historical precedent in planning natural parks and implementing NPS design standards for improvements in wilderness area parks. While the current study focused on the 32 acres within the footprint of the E1 Alternative, further evaluation of the park’s entire 16,000+ acres has the potential to establish eligibility under Criterion B for associations with influential NPS architects; under Criterion C for the architectural merit of its buildings and structures, both individually and collectively as a district; and under Criterion D for its collection of prehistoric archaeological sites and historical mining-related sites (components of the park’s mining sites may also be eligible under Criterion A pending further study).

In its entirety, the Roosevelt Canal—AZ T:10:83 (ASM)—is considered eligible for the NRHP under Criterion A for its associations with the historical development of irrigation districts in lower Salt River Valley. While previous studies for the South Mountain EIS Study acknowledged that the Roosevelt Canal was NRHP eligible (Burden 2002; Darling 2005), the specific segments within the proposed alternative alignments had not been assessed in terms of whether they are contributing or non-contributing to that eligibility. The Roosevelt Canal intersects the proposed alternative alignment footprints in four locations. The canal segments that cross the W55 and W71 Alternatives south of Van Buren Road retain integrity and are recommended as eligible to the National Register under Criterion A as contributing components. The segments that cross the proposed alternative alignments in the I-10 and the 101L freeway corridors are modern realignments that lack historical integrity, and therefore are recommended to be non-contributing components.


The rural residences at 6304 West Dobbins Road and 7316 West Lower Buckeye Road were added to the project’s APE as a result of alignment shifts referred to above. Both properties are on privately-owned land. Architectural historians with EcoPlan evaluated the properties’ eligibility (Brodbeck 2006, Appendix A). Both properties lack important historical associations and architectural merit, therefore, FHWA and ADOT recommend that neither property is eligible for inclusion in the NRHP.

Finally, the initial Class III survey report for the South Mountain Freeway study (Darling 2005) had identified the Western Canal (AZ T:12:154 [ASM]) as an historic property in the APE, in the E1 Alternative at Elliot Road. The Western Canal is owned and managed by Reclamation and SRP. Further study has indicated that this irrigation feature is actually a tail-water drainage ditch and that the Western Canal terminates prior to reaching the APE. FHWA and ADOT recommend that the Western Canal will not be affected by the proposed undertaking.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed cultural resource assessment report and information provided in this letter. If you find the report adequate and agree with the eligibility recommendations, please indicate your concurrence by signing

below. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely yours,


Robert E. Hollis
Division Administrator


Signature for SRP Concurrence

7 July 2006
Date

Enclosure



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 26, 2006

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Addendum Class III Survey Report

Mr. Leigh Kuwanwisiwma
Hopi Tribe
P.O. Box 123
Kykotsmovi, Arizona, 86039

Dear Mr. Kuwanwisiwma:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations on three alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 west of Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the U.S. Army Corps of Engineers (COE), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County (FCDMC), the Maricopa County Department of Transportation (MCDOT), the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 in west Chandler to I-10 west of Phoenix, south of the greater Phoenix metropolitan area. Alternative corridors are 1,000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.



The cultural resources component of the EIS includes five technical studies:

Previous Consultation:

- A Class I overview of the overall study area: “*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*” (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: “*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*” (Darling 2005). Consultation regarding adequacy of the report is on-going. To date, concurring responses have been received from SHPO (Jacobs, July 11, 2005), Reclamation (Ellis, July 12, 2005), BLM (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quetawki), July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report was titled “*An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck and Touchin 2005). The Class III report was titled “*An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck 2005). To date, concurring responses have been received from SHPO (Jacobs, October 3, 2005), Reclamation (Ellis, September 19, 2005), City of Phoenix (Bostwick, November 1, 2005), and SRP (Anduze, September 19, 2005).

Current Consultation:

A second addendum cultural resources assessment report has been prepared by HDR, Inc. in order to address the National Register of Historic Places (NRHP) eligibility of four properties and clarifies the location of a fifth property relative to the APE. In September 2005, the W55 and W71 were shifted north of the Salt River to avoid potential impact to historic properties. As a result of this shift, two historic residential properties were added to the APE: 6304 West Dobbins Road and 7316 West Lower Buckeye Road. Furthermore, two properties in the existing APE required additional evaluation: South Mountain Park/Preserve and specific segments of the Roosevelt Canal (AZ T:10:83 [ASM]) in the alternative alignments. Finally, the location of the Western Canal (AZ T:12:154 [ASM]) relative to the APE is addressed. The report, “*A Second Addendum Cultural Resources Report for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck 2006), assesses the NRHP eligibility of South Mountain Park/Preserve and the Roosevelt Canal

(Brodbeck 2006). As subconsultants to HDR, architectural historians with EcoPlan Associates (EcoPlan) assessed the two residential properties (Brodbeck 2006, Appendix A). The report is enclosed for your review and comment.

South Mountain Park/Preserve is a municipal park owned by the City of Phoenix and managed by their Parks and Recreation Department. Approximately 32 acres of the 16,000+ acre-park is in the proposed E1 Alignment. FHWA and ADOT recommend that the South Mountain Park/Preserve is eligible for inclusion in the NRHP under Criterion A for its associations with the National Park Service (NPS) and Civilian Conservation Corps (CCC) New Deal programs in Phoenix during the Depression era. The park is also recommended as eligible under Criterion C for its overall sensitive design that set historical precedent in planning natural parks and implementing NPS design, standards for improvements in wilderness area parks. While the current study focused on the 32 acres within the footprint of the E1 Alternative, further evaluation of the park’s entire 16,000+ acres has the potential to establish eligibility under Criterion B for associations with influential NPS architects; under Criterion C for the architectural merit of its buildings and structures, both individually and collectively as a district; and under Criterion D for its collection of prehistoric archaeological sites and historical mining-related sites (components of the park’s mining sites may also be eligible under Criterion A pending further study).

In its entirety, the Roosevelt Canal—AZ T:10:83 (ASM)—is considered eligible for the NRHP under Criterion A for its associations with the historical development of irrigation districts in lower Salt River Valley. While previous studies for the South Mountain EIS Study acknowledged that the Roosevelt Canal was NRHP eligible (Burden 2002; Darling 2005), the specific segments within the proposed alternative alignments had not been assessed in terms of whether they are contributing or non-contributing to that eligibility. The Roosevelt Canal intersects the proposed alternative alignment footprints in four locations. The canal segments that cross the W55 and W71 Alternatives south of Van Buren Road retain integrity and are recommended as eligible to the National Register under Criterion A as contributing components. The segments that cross the proposed alternative alignments in the I-10 and the 101L freeway corridors are modern realignments that lack historical integrity, and therefore are recommended to be non-contributing components.


The rural residences at 6304 West Dobbins Road and 7316 West Lower Buckeye Road were added to the project’s APE as a result of alignment shifts referred to above. Both properties are on privately-owned land. Architectural historians with EcoPlan evaluated the properties’ eligibility (Brodbeck 2006, Appendix A). Both properties lack important historical associations and architectural merit, therefore, FHWA and ADOT recommend that neither property is eligible for inclusion in the NRHP.


Finally, the initial Class III survey report for the South Mountain Freeway study (Darling 2005) had identified the Western Canal (AZ T:12:154 [ASM]) as an historic property in the APE, in the E1 Alternative at Elliot Road. The Western Canal is owned and managed by Reclamation and SRP. Further study has indicated that this irrigation feature is actually a tail-water drainage ditch and that the Western Canal terminates prior to reaching the APE. FHWA and ADOT recommend that the Western Canal will not be affected by the proposed undertaking.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed cultural resource assessment report and information provided in this letter. If you find the report adequate and agree with the eligibility recommendations, please indicate your concurrence by signing

below. At this time, FHWA is once again inquiring whether you have any concerns regarding historic properties of religious or cultural importance to your community within the project area. If you have such concerns, any information you might provide within 30 days of receipt of this letter would be considered in the project planning. If your office opts to participate in cultural resource consultation at a later date, FHWA would make a good faith effort to address any concerns. However, such consultation would not necessitate a reconsideration of this determination of project effect. We also look forward to continuing consultation with your office. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely yours,


Robert E. Hollis
Division Administrator



Signature for Hopi Concurrence

Date

6/3/06

Enclosure

2006 JUL 11 AM 7:12



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 26, 2006

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 HS764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Addendum Class III Survey Report

Mr. Larry Hendershot
Flood Control District of Maricopa County
2801 West Durango Street
Phoenix, Arizona, 85009

Dear Mr. Hendershot:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations on three alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 west of Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the U.S. Army Corps of Engineers (COE), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County (FCDMC), the Maricopa County Department of Transportation (MCDOT), the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 in west Chandler to I-10 west of Phoenix, south of the greater Phoenix metropolitan area. Alternative corridors are 1,000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.



The cultural resources component of the EIS includes five technical studies:

Previous Consultation:

- A Class I overview of the overall study area: *"A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona"* (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: *"A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona"* (Darling 2005). Consultation regarding adequacy of the report is on-going. To date, concurring responses have been received from SHPO (Jacobs, July 11, 2005), Reclamation (Ellis, July 12, 2005), BLM (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quetawki), July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report was titled *"An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona"* (Brodbeck and Touchin 2005). The Class III report was titled *"An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona"* (Brodbeck 2005). To date, concurring responses have been received from SHPO (Jacobs, October 3, 2005), Reclamation (Ellis, September 19, 2005), City of Phoenix (Bostwick, November 1, 2005), and SRP (Anduze, September 19, 2005).

Current Consultation:

A second addendum cultural resources assessment report has been prepared by HDR, Inc. in order to address the National Register of Historic Places (NRHP) eligibility of four properties and clarifies the location of a fifth property relative to the APE. In September 2005, the W55 and W71 were shifted north of the Salt River to avoid potential impact to historic properties. As a result of this shift, two historic residential properties were added to the APE: 6304 West Dobbins Road and 7316 West Lower Buckeye Road. Furthermore, two properties in the existing APE required additional evaluation: South Mountain Park/Preserve and specific segments of the Roosevelt Canal (AZ T:10:83 [ASM]) in the alternative alignments. Finally, the location of the Western Canal (AZ T:12:154 [ASM]) relative to the APE is addressed. The report, *"A Second Addendum Cultural Resources Report for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona"* (Brodbeck 2006), assesses the NRHP eligibility of South Mountain Park/Preserve and the Roosevelt Canal

(Brodbeck 2006). As subconsultants to HDR, architectural historians with EcoPlan Associates (EcoPlan) assessed the two residential properties (Brodbeck 2006, Appendix A). The report is enclosed for your review and comment.

South Mountain Park/Preserve is a municipal park owned by the City of Phoenix and managed by their Parks and Recreation Department. Approximately 32 acres of the 16,000+ acre-park is in the proposed E1 Alignment. FHWA and ADOT recommend that the South Mountain Park/Preserve is eligible for inclusion in the NRHP under Criterion A for its associations with the National Park Service (NPS) and Civilian Conservation Corps (CCC) New Deal programs in Phoenix during the Depression era. The park is also recommended as eligible under Criterion C for its overall sensitive design that set historical precedent in planning natural parks and implementing NPS design standards for improvements in wilderness area parks. While the current study focused on the 32 acres within the footprint of the E1 Alternative, further evaluation of the park's entire 16,000+ acres has the potential to establish eligibility under Criterion B for associations with influential NPS architects; under Criterion C for the architectural merit of its buildings and structures, both individually and collectively as a district; and under Criterion D for its collection of prehistoric archaeological sites and historical mining-related sites (components of the park's mining sites may also be eligible under Criterion A pending further study).

In its entirety, the Roosevelt Canal—AZ T:10:83 (ASM)—is considered eligible for the NRHP under Criterion A for its associations with the historical development of irrigation districts in lower Salt River Valley. While previous studies for the South Mountain EIS Study acknowledged that the Roosevelt Canal was NRHP eligible (Burden 2002; Darling 2005), the specific segments within the proposed alternative alignments had not been assessed in terms of whether they are contributing or non-contributing to that eligibility. The Roosevelt Canal intersects the proposed alternative alignment footprints in four locations. The canal segments that cross the W55 and W71 Alternatives south of Van Buren Road retain integrity and are recommended as eligible to the National Register under Criterion A as contributing components. The segments that cross the proposed alternative alignments in the I-10 and the 101L freeway corridors are modern realignments that lack historical integrity, and therefore are recommended to be non-contributing components.


The rural residences at 6304 West Dobbins Road and 7316 West Lower Buckeye Road were added to the project's APE as a result of alignment shifts referred to above. Both properties are on privately-owned land. Architectural historians with EcoPlan evaluated the properties' eligibility (Brodbeck 2006, Appendix A). Both properties lack important historical associations and architectural merit, therefore, FHWA and ADOT recommend that neither property is eligible for inclusion in the NRHP.


Finally, the initial Class III survey report for the South Mountain Freeway study (Darling 2005) had identified the Western Canal (AZ T:12:154 [ASM]) as an historic property in the APE, in the E1 Alternative at Elliot Road. The Western Canal is owned and managed by Reclamation and SRP. Further study has indicated that this irrigation feature is actually a tail-water drainage ditch and that the Western Canal terminates prior to reaching the APE. FHWA and ADOT recommend that the Western Canal will not be affected by the proposed undertaking.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed cultural resource assessment report and information provided in this letter. If you find the report adequate and agree with the eligibility recommendations, please indicate your concurrence by signing

below. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely yours,


Robert E. Hollis
Division Administrator


Signature for FCD Concurrence
Environmental Program Manager

7-06-06
Date

Enclosure

2006 JUL 12 PM 12:12



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 26, 2006

In Reply Refer To: HA-AZ,
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 011.
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Addendum Class III Survey Report

Ms. Kathleen Wesley-Kitcheyan, Chair
San Carlos Apache Tribe
P.O. Box 0
San Carlos, Arizona, 85550

Dear Chairperson Wesley-Kitcheyan:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations on three alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 west of Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the U.S. Army Corps of Engineers (COE), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County (FCDMC), the Maricopa County Department of Transportation (MCDOT), the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 in west Chandler to I-10 west of Phoenix, south of the greater Phoenix metropolitan area. Alternative corridors are 1,000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.



The cultural resources component of the EIS includes five technical studies:

Previous Consultation:

- A Class I overview of the overall study area: "*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*" (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: "*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*" (Darling 2005). Consultation regarding adequacy of the report is on-going. To date, concurring responses have been received from SHPO (Jacobs, July 11, 2005), Reclamation (Ellis, July 12, 2005), BLM (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quctawki), July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report was titled "*An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*" (Brodbeck and Touchin 2005). The Class III report was titled "*An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*" (Brodbeck 2005). To date, concurring responses have been received from SHPO (Jacobs, October 3, 2005), Reclamation (Ellis, September 19, 2005), City of Phoenix (Bostwick, November 1, 2005), and SRP (Anduze, September 19, 2005).

Current Consultation:

A second addendum cultural resources assessment report has been prepared by HDR, Inc. in order to address the National Register of Historic Places (NRHP) eligibility of four properties and clarifies the location of a fifth property relative to the APE. In September 2005, the W55 and W71 were shifted north of the Salt River to avoid potential impact to historic properties. As a result of this shift, two historic residential properties were added to the APE: 6304 West Dobbins Road and 7316 West Lower Buckeye Road. Furthermore, two properties in the existing APE required additional evaluation: South Mountain Park/Preserve and specific segments of the Roosevelt Canal (AZ T:10:83 [ASM]) in the alternative alignments. Finally, the location of the Western Canal (AZ T:12:154 [ASM]) relative to the APE is addressed. The report, "*A Second Addendum Cultural Resources Report for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona*" (Brodbeck 2006), assesses the NRHP eligibility of South Mountain Park/Preserve and the Roosevelt Canal

(Brodbeck 2006). As subconsultants to HDR, architectural historians with EcoPlan Associates (EcoPlan) assessed the two residential properties (Brodbeck 2006, Appendix A). The report is enclosed for your review and comment.

South Mountain Park/Preserve is a municipal park owned by the City of Phoenix and managed by their Parks and Recreation Department. Approximately 32 acres of the 16,000+ acre-park is in the proposed E1 Alignment. FHWA and ADOT recommend that the South Mountain Park/Preserve is eligible for inclusion in the NRHP under Criterion A for its associations with the National Park Service (NPS) and Civilian Conservation Corps (CCC) New Deal programs in Phoenix during the Depression era. The park is also recommended as eligible under Criterion C for its overall sensitive design that set historical precedent in planning natural parks and implementing NPS design standards for improvements in wilderness area parks. While the current study focused on the 32 acres within the footprint of the E1 Alternative, further evaluation of the park's entire 16,000+ acres has the potential to establish eligibility under Criterion B for associations with influential NPS architects; under Criterion C for the architectural merit of its buildings and structures, both individually and collectively as a district; and under Criterion D for its collection of prehistoric archaeological sites and historical mining-related sites (components of the park's mining sites may also be eligible under Criterion A pending further study).

In its entirety, the Roosevelt Canal AZ T:10:83 (ASM)—is considered eligible for the NRHP under Criterion A for its associations with the historical development of irrigation districts in lower Salt River Valley. While previous studies for the South Mountain EIS Study acknowledged that the Roosevelt Canal was NRHP eligible (Burden 2002; Darling 2005), the specific segments within the proposed alternative alignments had not been assessed in terms of whether they are contributing or non-contributing to that eligibility. The Roosevelt Canal intersects the proposed alternative alignment footprints in four locations. The canal segments that cross the W55 and W71 Alternatives south of Van Buren Road retain integrity and are recommended as eligible to the National Register under Criterion A as contributing components. The segments that cross the proposed alternative alignments in the I-10 and the 101L freeway corridors are modern realignments that lack historical integrity, and therefore are recommended to be non-contributing components.

The rural residences at 6304 West Dobbins Road and 7316 West Lower Buckeye Road were added to the project's APE as a result of alignment shifts referred to above. Both properties are on privately-owned land. Architectural historians with EcoPlan evaluated the properties' eligibility (Brodbeck 2006, Appendix A). Both properties lack important historical associations and architectural merit, therefore, FHWA and ADOT recommend that neither property is eligible for inclusion in the NRHP.

Finally, the initial Class III survey report for the South Mountain Freeway study (Darling 2005) had identified the Western Canal (AZ T:12:154 [ASM]) as an historic property in the APE, in the E1 Alternative at Elliot Road. The Western Canal is owned and managed by Reclamation and SRP. Further study has indicated that this irrigation feature is actually a tail-water drainage ditch and that the Western Canal terminates prior to reaching the APE. FHWA and ADOT recommend that the Western Canal will not be affected by the proposed undertaking.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed cultural resource assessment report and information provided in this letter. If you find the report adequate and agree with the eligibility recommendations, please indicate your concurrence by signing

below. At this time, FHWA is once again inquiring whether you have any concerns regarding historic properties of religious or cultural importance to your community within the project area. If you have such concerns, any information you might provide within 30 days of receipt of this letter would be considered in the project planning. If your office opts to participate in cultural resource consultation at a later date, FHWA would make a good faith effort to address any concerns. However, such consultation would not necessitate a reconsideration of this determination of project effect. We also look forward to continuing consultation with your office. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely yours,

STEPHEN D. THOMAS

Robert E. Hollis
Division Administrator

Barney W. Hitchman
Signature for SCAT Concurrence

July 17, 2006
Date

Enclosure

cc.

Vernelda Grant, Tribal Archaeologist, P.O. Box 0, San Carlos, Arizona 85550 (enclosure)

SThomas

RGreenspan (MD 619E)

SDThomas:cdm



"Managing and conserving natural, cultural, and recreational resources"

July 19, 2006

Robert E. Hollis, Division Administrator
Federal Highway Administration, Arizona Division
U.S. Department of Transportation
One Arizona Center, Suite 410
400 E. Van Buren Street
Phoenix, AZ 85004-0674

Attention: Stephen Thomas

Janet Napolitano
Governor

State Parks
Board Members

Chair
William C. Porter
Kingman

William Cordasco
Flagstaff

Janice Chilton
Payson

William C. Scalzo
Phoenix

Reese Woodling
Tucson

Elizabeth Stewart
Tempe

Mark Winkleman
State Land
Commissioner

Kenneth E. Travous
Executive Director

Arizona State Parks
1300 W. Washington
Phoenix, AZ 85007

Tel & TTY: 602.542.4174
www.azstateparks.com

800.285.3703 from
(520 & 928) area codes

General Fax:
602.542.4180

Director's Office Fax:
602.542.4188

RE: HA-AZ; NH-202-D(ADY);
TRACS No. 202L MA 054 H5764 01L;
South Mountain Transportation Corridor
Continuing Section 106 Consultation
SHPO-2003-1890 (29666)

Dear Mr. Hollis:

Thank you for consulting with the State Historic Preservation Office (SHPO) regarding the alternative alignments for the proposed South Mountain Freeway and submitting materials for review and comment pursuant to Section 106 of the National Historic Preservation Act as implemented by 36 CFR Part 800. Dr. Bill Collins, Deputy SHPO/Historian, and I have reviewed the submitted materials and have the following comments.

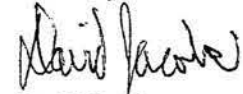
The submitted report [*A Second Addendum Cultural Resources Report for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona*] addresses the eligibility for inclusion in the National Register of Historic Places (NRHP) of four properties in the area of potential effect (APE), and also discusses the location of the Western Canal, previously believed to fall with the APE. We concur with the FHWA/ADOT recommendations regarding the two rural residential properties [6304 West Dobbins Road and 7316 West Lower Buckeye Road], the Roosevelt Canal [AZ T:10:83 (ASM)], and the Western Canal [AZ T:12:154 (ASM)].

We also agree with the recommendation that the South Mountain Park/Preserve is eligible for inclusion to the NRHP under Criterion A, but suggest restating the eligibility in association with the development of parks and recreation in Phoenix [also in the West generally for the unique emphasis on mountain preserves] and not with the CCC. The CCC constitutes just a small portion of the park. Additionally, we agree with the FHWA/ADOT recommendations regarding eligibility of the South Mountain Park/Preserve for inclusion to the NRHP under Criteria B, C, and D.

July 19, 2006
Page 2, Hollis

If you have any questions, please contact me at (602) 542-7140 or electronically at djacobs@pr.state.az.us.

Sincerely,



David Jacobs
Compliance Specialist/Archaeologist
State Historic Preservation Office

CC: Ruth Greenspan, ADOT



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 26, 2006

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Addendum Class III Survey Report

Mr. Charlie McClendon
City Manager
Avondale City Hall
11465 West Civic Center Drive, Suite 200
Avondale, Arizona, 85323

Dear Mr. McClendon:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations on three alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 west of Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the U.S. Army Corps of Engineers (COE), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County (FCDMC), the Maricopa County Department of Transportation (MCDOT), the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 in west Chandler to I-10 west of Phoenix, south of the greater



Phoenix metropolitan area. Alternative corridors are 1,000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.

The cultural resources component of the EIS includes five technical studies:

Previous Consultation:

- A Class I overview of the overall study area: “*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*” (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: “*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*” (Darling 2005). Consultation regarding adequacy of the report is on-going. To date, concurring responses have been received from SHPO (Jacobs, July 11, 2005), Reclamation (Ellis, July 12, 2005), BLM (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quetawki, July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report was titled “*An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck and Touchin 2005). The Class III report was titled “*An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck 2005). To date, concurring responses have been received from SHPO (Jacobs, October 3, 2005), Reclamation (Ellis, September 19, 2005), City of Phoenix (Bostwick, November 1, 2005), and SRP (Anduze, September 19, 2005).

Current Consultation:

A second addendum cultural resources assessment report has been prepared by HDR, Inc. in order to address the National Register of Historic Places (NRHP) eligibility of four properties and clarifies the location of a fifth property relative to the APE. In September 2005, the W55 and W71 were shifted north of the Salt River to avoid potential impact to historic properties. As a result of this shift, two historic residential properties were added to the APE: 6304 West Dobbins Road and 7316 West Lower Buckeye Road. Furthermore, two properties in the existing APE required additional evaluation: South Mountain Park/Preserve and specific segments of the Roosevelt Canal (AZ T:10:83 [ASM]) in the alternative alignments. Finally, the location of the Western Canal (AZ T:12:154 [ASM]) relative to the APE is addressed. The report, “*A Second Addendum Cultural Resources Report for the 202L, South*

Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona” (Brodbeck 2006), assesses the NRHP eligibility of South Mountain Park/Preserve and the Roosevelt Canal (Brodbeck 2006). As subconsultants to HDR, architectural historians with EcoPlan Associates (EcoPlan) assessed the two residential properties (Brodbeck 2006, Appendix A). The report is enclosed for your review and comment.

South Mountain Park/Preserve is a municipal park owned by the City of Phoenix and managed by their Parks and Recreation Department. Approximately 32 acres of the 16,000+ acre-park is in the proposed E1 Alignment. FHWA and ADOT recommend that the South Mountain Park/Preserve is eligible for inclusion in the NRHP under Criterion A for its associations with the National Park Service (NPS) and Civilian Conservation Corps (CCC) New Deal programs in Phoenix during the Depression era. The park is also recommended as eligible under Criterion C for its overall sensitive design that set historical precedent in planning natural parks and implementing NPS design standards for improvements in wilderness area parks. While the current study focused on the 32 acres within the footprint of the E1 Alternative, further evaluation of the park’s entire 16,000+ acres has the potential to establish eligibility under Criterion B for associations with influential NPS architects; under Criterion C for the architectural merit of its buildings and structures, both individually and collectively as a district; and under Criterion D for its collection of prehistoric archaeological sites and historical mining-related sites (components of the park’s mining sites may also be eligible under Criterion A pending further study).

In its entirety, the Roosevelt Canal—AZ T:10:83 (ASM)—is considered eligible for the NRHP under Criterion A for its associations with the historical development of irrigation districts in lower Salt River Valley. While previous studies for the South Mountain EIS Study acknowledged that the Roosevelt Canal was NRHP eligible (Burden 2002; Darling 2005), the specific segments within the proposed alternative alignments had not been assessed in terms of whether they are contributing or non-contributing to that eligibility. The Roosevelt Canal intersects the proposed alternative alignment footprints in four locations. The canal segments that cross the W55 and W71 Alternatives south of Van Buren Road retain integrity and are recommended as eligible to the National Register under Criterion A as contributing components. The segments that cross the proposed alternative alignments in the I-10 and the 101L freeway corridors are modern realignments that lack historical integrity, and therefore are recommended to be non-contributing components.

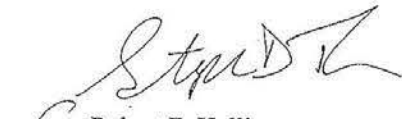
The rural residences at 6304 West Dobbins Road and 7316 West Lower Buckeye Road were added to the project’s APE as a result of alignment shifts referred to above. Both properties are on privately-owned land. Architectural historians with EcoPlan evaluated the properties’ eligibility (Brodbeck 2006, Appendix A). Both properties lack important historical associations and architectural merit, therefore, FHWA and ADOT recommend that neither property is eligible for inclusion in the NRHP.


Finally, the initial Class III survey report for the South Mountain Freeway study (Darling 2005) had identified the Western Canal (AZ T:12:154 [ASM]) as an historic property in the APE, in the E1 Alternative at Elliot Road. The Western Canal is owned and managed by Reclamation and SRP. Further study has indicated that this irrigation feature is actually a tail-water drainage ditch and that the Western Canal terminates prior to reaching the APE. FHWA and ADOT recommend that the Western Canal will not be affected by the proposed undertaking.

As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed

cultural resource assessment report and information provided in this letter. If you find the report adequate and agree with the eligibility recommendations, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely yours,


Robert E. Hollis
Division Administrator


Signature for Avondale Concurrence

7-25-06
Date

Enclosure



Arizona Division
400 East Van Buren Street
One Arizona Center Suite 410
Phoenix, Arizona 85004-0674

June 26, 2006

In Reply Refer To: HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01L
South Mountain Transportation Corridor
Continuing Section 106 Consultation
Second Addendum Class III Survey Report

Mr. Bryan Lausten, Archaeologist
Bureau of Reclamation
Phoenix Area Office
6150 West Thunderbird Road
Glendale, Arizona, 85306

Dear Mr. Lausten:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses ten variations on three alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 west of Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

Potential consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Bureau of Reclamation (Reclamation), the U.S. Army Corps of Engineers (COE), the Arizona State Land Department (ASLD), the Salt River Project (SRP), the Roosevelt Irrigation District (RID), the Flood Control District of Maricopa County (FCDMC), the Maricopa County Department of Transportation (MCDOT), the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pasqua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The Area of Potential Effect (APE) is comprised of ten alternative (overlapping) freeway corridors (E1, W55, W71, W101WPR, W101WFR, W101W99, W101CPR, W101CFR, W101EPR, and W101EFR) that extend from I-10 in west Chandler to I-10 west of Phoenix, south of the greater



Phoenix metropolitan area. Alternative corridors are 1,000-ft (304.8-m) wide and range from 21.5 miles (34.6 km) to 23.6 miles (38.0 km) in length.

The cultural resources component of the EIS includes five technical studies:

Previous Consultation:

- A Class I overview of the overall study area: “*A Class I Overview of the South Mountain Corridor Study Area, Maricopa County, Arizona*” (Burden 2002). Previous consultation regarding adequacy of the report resulted in concurrences/responses from SHPO (Jacobs, September 19, 2003); BLM (Stone, September 22, 2003); City of Phoenix (Stocklin, September 8, 2003 and Bostwick, September 17, 2003); the Hopi Tribe (Kuwanwisiwma, September 10, 2003); Yavapai Prescott (Jones, September 10, 2003); Reclamation (Heathington, September 11, 2003); SRP (Anduze, November 10, 2003); and BIA (October 27, 2003).
- A Class III survey of the proposed alternative alignments: “*A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona*” (Darling 2005). Consultation regarding adequacy of the report is on-going. To date, concurring responses have been received from SHPO (Jacobs, July 11, 2005), Reclamation (Ellis, July 12, 2005), BLM (Stone, July 26, 2005), City of Phoenix (Bostwick, July 18, 2005), Pueblo of Zuni (Quetawki), July 12, 2005), Yavapai-Prescott Indian Tribe (Kwiatkowski, July 22, 2005).
- An addendum Class I overview and addendum Class III survey to address the expansion of the overall study area to include portions of the I-10 and State Route 101L freeway corridors and shifts in the alternative alignments (late 2004 and early 2005). The addendum Class I report was titled “*An Addendum Cultural Resources Class I Overview Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck and Touchin 2005). The Class III report was titled “*An Addendum Cultural Resources Report for the 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona*” (Brodbeck 2005). To date, concurring responses have been received from SHPO (Jacobs, October 3, 2005), Reclamation (Ellis, September 19, 2005), City of Phoenix (Bostwick, November 1, 2005), and SRP (Anduze, September 19, 2005).

Current Consultation:

A second addendum cultural resources assessment report has been prepared by HDR, Inc. in order to address the National Register of Historic Places (NRHP) eligibility of four properties and clarifies the location of a fifth property relative to the APE. In September 2005, the W55 and W71 were shifted north of the Salt River to avoid potential impact to historic properties. As a result of this shift, two historic residential properties were added to the APE: 6304 West Dobbins Road and 7316 West Lower Buckeye Road. Furthermore, two properties in the existing APE required additional evaluation: South Mountain Park/Preserve and specific segments of the Roosevelt Canal (AZ T:10:83 [ASM]) in the alternative alignments. Finally, the location of the Western Canal (AZ T:12:154 [ASM]) relative to the APE is addressed. The report, “*A Second Addendum Cultural Resources Report for the 202L, South*

Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona” (Brodbeck 2006), assesses the NRHP eligibility of South Mountain Park/Preserve and the Roosevelt Canal (Brodbeck 2006). As subconsultants to HDR, architectural historians with EcoPlan Associates (EcoPlan) assessed the two residential properties (Brodbeck 2006, Appendix A). The report is enclosed for your review and comment.

South Mountain Park/Preserve is a municipal park owned by the City of Phoenix and managed by their Parks and Recreation Department. Approximately 32 acres of the 16,000+ acre-park is in the proposed E1 Alignment. FHWA and ADOT recommend that the South Mountain Park/Preserve is eligible for inclusion in the NRHP under Criterion A for its associations with the National Park Service (NPS) and Civilian Conservation Corps (CCC) New Deal programs in Phoenix during the Depression era. The park is also recommended as eligible under Criterion C for its overall sensitive design that set historical precedent in planning natural parks and implementing NPS design standards for improvements in wilderness area parks. While the current study focused on the 32 acres within the footprint of the E1 Alternative, further evaluation of the park’s entire 16,000+ acres has the potential to establish eligibility under Criterion B for associations with influential NPS architects; under Criterion C for the architectural merit of its buildings and structures, both individually and collectively as a district; and under Criterion D for its collection of prehistoric archaeological sites and historical mining-related sites (components of the park’s mining sites may also be eligible under Criterion A pending further study).

In its entirety, the Roosevelt Canal—AZ T:10:83 (ASM)—is considered eligible for the NRHP under Criterion A for its associations with the historical development of irrigation districts in lower Salt River Valley. While previous studies for the South Mountain EIS Study acknowledged that the Roosevelt Canal was NRHP eligible (Burden 2002; Darling 2005), the specific segments within the proposed alternative alignments had not been assessed in terms of whether they are contributing or non-contributing to that eligibility. The Roosevelt Canal intersects the proposed alternative alignment footprints in four locations. The canal segments that cross the W55 and W71 Alternatives south of Van Buren Road retain integrity and are recommended as eligible to the National Register under Criterion A as contributing components. The segments that cross the proposed alternative alignments in the I-10 and the 101L freeway corridors are modern realignments that lack historical integrity, and therefore are recommended to be non-contributing components.

The rural residences at 6304 West Dobbins Road and 7316 West Lower Buckeye Road were added to the project’s APE as a result of alignment shifts referred to above. Both properties are on privately-owned land. Architectural historians with EcoPlan evaluated the properties’ eligibility (Brodbeck 2006, Appendix A). Both properties lack important historical associations and architectural merit, therefore, FHWA and ADOT recommend that neither property is eligible for inclusion in the NRHP.


Finally, the initial Class III survey report for the South Mountain Freeway study (Darling 2005) had identified the Western Canal (AZ T:12:154 [ASM]) as an historic property in the APE, in the E1 Alternative at Elliot Road. The Western Canal is owned and managed by Reclamation and SRP. Further study has indicated that this irrigation feature is actually a tail-water drainage ditch and that the Western Canal terminates prior to reaching the APE. FHWA and ADOT recommend that the Western Canal will not be affected by the proposed undertaking.


As more information becomes available regarding the South Mountain Freeway project, it will be provided to your agency through continued Section 106 consultation. Please review the enclosed

4

cultural resource assessment report and information provided in this letter. If you find the report adequate and agree with the eligibility recommendations, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Ruth Greenspan at 602-712-6266 or e-mail rgreenspan@azdot.gov.

Sincerely yours,


Robert E. Hollis
Division Administrator


Signature for Reclamation Concurrence

8-1-06
Date

Enclosure

Ruth Greenspan

From: Amalia Reyes [Amalia.Reyes@pascuayaqui-nsn.gov]
Sent: Tuesday, August 01, 2006 2:15 PM
To: Ruth Greenspan
Subject: South Mountain Freeway

Ms. Greenspan,

The Pascua Yaqui Tribe has received the documents for:

HA-AZ
NH-202-D(ADY)
TRACS No. 202L MA 054 H576401L
South Mountain Transportation Corridor

The tribe has no concerns with the freeway corridor project. If you have any questions, please contact me at the address below.

Thank you.

Amalia A.M. Reyes
Resource Coordinator
Education Administration Division
amalia.reyes@pascuayaqui-nsn.gov
(520) 879-5742
Fax: (520) 883-5049